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DRAFT FINDING PURSUANT TO MASSACHUSETTS GENERAL LAWS CHAPTER 30, SECTION 61 IMPACT ON THE NATURAL ENVIRONMENT

**EOEA No. 6826** 



Massachusetts Bay Transportation Authority

Prepared by:

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October, 1994



# MASSACHUSETTS BAY TRANSPORTATION AUTHORITY

# Finding Pursuant to Massachusetts General Laws Chapter 30, Section 61 Impact on the Natural Environment

## SOUTH BOSTON PIERS/FORT POINT CHANNEL TRANSIT PROJECT

## Executive Office of Environmental Affairs Reference Number 6826

## Introduction

In accordance with the Massachusetts Environmental Policy Act, M.G.L. c.30, §61-62H and its implementing regulations, the Massachusetts Bay Transportation Authority ("MBTA") has completed environmental studies for the South Boston Piers/Fort Point Channel Transit Project, including a Draft Environmental Impact Report, Draft Environmental Impact Statement/Supplemental Draft Environmental Impact Report, Environmental Assessment/Notice of Project Change, and Final Environmental Impact Statement/Final Environmental Impact Report. These studies have provided comprehensive analyses of various transit alternatives to serve future development in the South Boston Piers area, and have resulted in the selection of the South Boston Piers Transitway as the preferred alternative for implementation. The rationale for selection of the Transitway is based in part on the ability to jointly construct a portion of the project with the Massachusetts Highway Department's Central Artery/Tunnel Project, resulting in significantly reduced environmental impacts and costs.

In the project's Final Environmental Impact Statement/Final Environmental Impact Report (FEIS/FEIR) published in December 1993, two important decisions remained unresolved: (1) whether to underpin or acquire the New England Seafood Center, and (2) the location of a maintenance facility for the project. This Draft Section 61 Finding resolves these two remaining decisions. In addition, the Finding responds to all other issues raised either in the Certificate of the Secretary of Environmental Affairs or in comment letters received on the project's FEIS/FEIR. In addressing these issues and identifying the project's impacts and associated mitigation to be implemented, this Draft Section 61 Finding states, in accordance with M.G.L. c.30, §61, the MBTA's required findings for the Transitway Project, demonstrating that all feasible measures have been taken to avoid or minimize potential adverse impacts of the project.

The remainder of the Draft Section 61 Finding is organized into six key sections. In the first section, the Transitway Project is described. Next, the Massachusetts environmental policy review process conducted for the project by the MBTA is overviewed. Resolution of the two decisions remaining for the Transitway Project at the conclusion of the FEIS/FEIR is provided in the third section. The fourth section describes how each specific requirement set forth in the Certificate of the Secretary of Environmental Affairs is addressed. These responses to the Secretary's requirements are then reflected in the fifth section of the Finding, which describes the anticipated

# MASSACHUSETTE BAY TRANSPORTATION AUTHORITY

Finding Pursuant to
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Chapter 30, Section 61
Impact on the Matural Environment

SOUTH BOSTON PIERS/FORT POINT CHAINEL TRANSIT PROJECT

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impacts of and proposed mitigation for the project. Finally, the sixth section contains the MBTA's finding of impact and mitigation commitment for the Transitway Project. By implementing the proposed mitigation described in this Draft Section 61 Finding, the MBTA finds that all feasible means and measures will have been taken to avoid or minimize adverse impacts of the project.

The Finding also includes an appendix that responds in detail to all comments received on the project's FEIS/FEIR. Copies of all comment letters, as well as the Certificate of the Secretary of Environmental Affairs, are contained within the appendix.

# Project Description

The South Boston Piers Transitway Project represents the optimization of both a fixed guideway and bus solution to serving future growth in trip demand generated by new development in the South Boston Piers area. A 1.5-mile underground transit tunnel from Boylston Station to the World Trade Center combined with surface bus operations on streets will link this new development with regional mass transit services in downtown Boston. Five underground Transitway stations and numerous surface bus stops will provide connections to the Red, Orange, and Green Lines as well as to commuter and intercity rail and bus services.

Trackless trolleys will be operated in the Transitway tunnel, on two surface routes in the easternmost portion of the Piers area, and on a surface route to residential South Boston. Conventional buses will supplement this service on surface streets. A storage and maintenance facility will be constructed to accommodate a fleet of up to 166 vehicles, 53 of which will be articulated trackless trolleys. The system will provide access for persons with disabilities in accordance with the requirements of the Americans With Disabilities Act (ADA).

Construction of the South Boston Piers Transitway Project will be staged, with the initial build segment consisting of a tunnel from South Station to the World Trade Center scheduled to open for revenue operations in the year 2000. The second stage of the project extends the Transitway tunnel westward from South Station to Boylston Station; this stage is expected to be completed in 2008. Between 1998 and opening of the first stage of the project in 2000, interim bus service will be operated to serve existing and near-term development in the western portion of the Piers area.

The alignment of the initial build segment begins at a new Transitway station constructed at the present mezzanine level of South Station to allow transfer connections with the Red Line and commuter and intercity rail and bus services. An underground bus loop extending beneath Atlantic Avenue will permit turnaround of Transitway vehicles at South Station. The Transitway tunnel will cross over the Red Line tunnel at South Station.

From South Station, the alignment continues north under Atlantic Avenue to 200 feet south of Congress Street. Joint construction will be undertaken with the northbound Central Artery between Essex and Congress Streets in order to achieve substantial cost savings and to avoid the impacts created by two separate construction efforts; the Transitway tunnel will be constructed directly above the northbound Central Artery along Atlantic Avenue. At a point roughly 200 feet south of Congress Street, the alignment turns east under the Russia Wharf buildings and the southeastern

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# Project Description

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corner of the Boston Edison parcel. East of Russia Wharf, the alignment crosses under the Fort Point Channel south of the New Northern Avenue Bridge.

After crossing the Fort Point Channel, an underground station known as Courthouse Station will be constructed between Farnsworth and Pittsburgh Streets in the vicinity of the new Federal Courthouse and Fan Pier. From Courthouse Station, the alignment follows beneath New Northern Avenue until a point just west of East Service Road. At this point, the alignment turns southeast, cutting diagonally from New Northern Avenue to New Congress Street. An underground station — World Trade Center Station — will be constructed in the lower level of the proposed Massachusetts Port Authority replacement parking garage just east of Viaduct Street.

East of the World Trade Center Station, a surface alignment is proposed due to less intensive development planned for the eastern portion of the Piers area. Transitway buses will surface at D Street and operate to the Boston Marine Industrial Park (BMIP) or Summer and Fargo Streets in mixed traffic. Transitway service to BMIP will operate via Northern Avenue and terminate on Drydock Avenue. After leaving the World Trade Center Station and surfacing in the Piers area, surface stops will be made at approximately 1,000 foot intervals, depending upon actual development patterns. Stops in the vicinity of BMIP will be at closer intervals, due to more concentrated development in that area.

The second stage of the project — the full build segment — connects the initial build Transitway to midtown. At Boylston Station, a new platform and turnaround loop to serve the Transitway will be constructed one level below the existing Boylston Station Green Line platforms. From Boylston Station, the alignment turns east beneath Avery Street, with an underground station located in the vicinity of the intersection of Washington Street and Hayward Place. At that station, transfers can be made to the Chinatown Station of the Orange Line. The alignment will follow Avenue de Lafayette and Essex Street eastward, turning north under Atlantic Avenue to South Station. The full build Transitway also includes a surface route from the D Street portal to the City Point residential section of South Boston.

Figure 1 shows the Transitway tunnel and surface routes, differentiating between the initial build and full build stages of the project.

# ■ The Massachusetts Environmental Policy Review Process

The South Boston Piers Transitway Project has been reviewed in conformance with the process specified in the Massachusetts Environmental Policy Act (MEPA) regulations. This review process has involved preparation of an Environmental Notification Form (ENF), a scoping process, and the publication and circulation of a Draft Environmental Impact Report (DEIR), Draft Environmental Impact Statement/Supplemental Draft Environmental Impact Report (DEIS/SDEIR), an Environmental Assessment/Notice of Project Change (EA/NPC), and a Final Environmental Impact Statement/Final Environmental Impact Report (FEIS/FEIR). A summary of the environmental review process is provided below.

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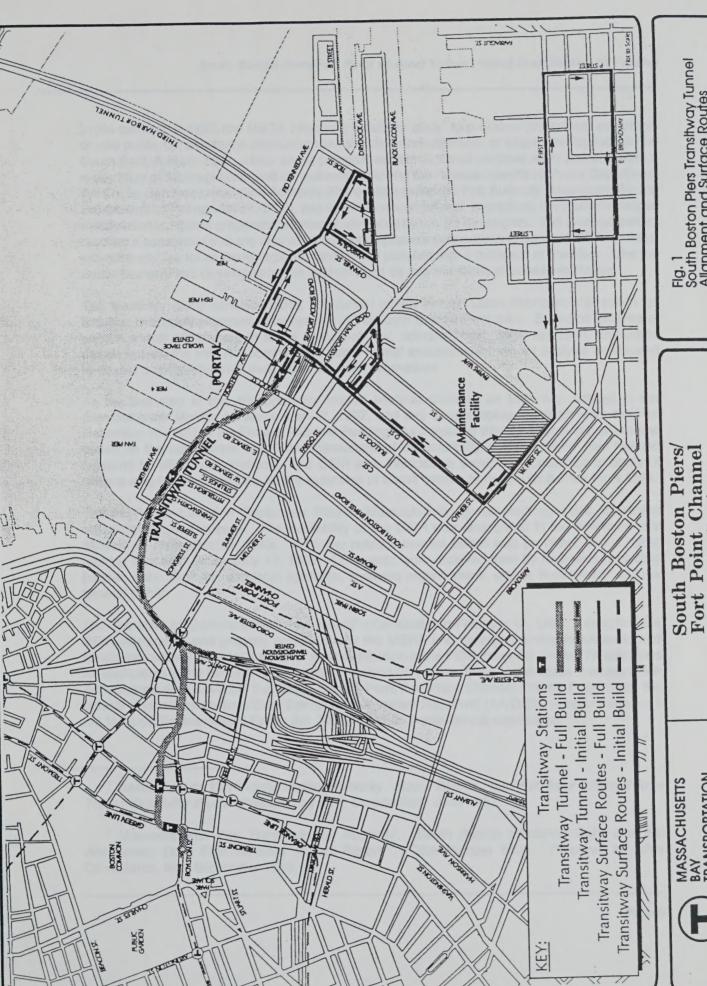


Fig. 1 South Boston Plers Transltway Tunnel Alignment and Surface Routes

Transit Project

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In the summer of 1987, the MBTA initiated a feasibility study¹ to provide a preliminary evaluation of new public transit service alternatives to meet the travel demands of future development in the South Boston Piers area. Ideas about potential additional transit services were solicited from a wide range of local agencies and consultants, including the Massachusetts Highway Department (MHD), Boston Redevelopment Authority (BRA), Massachusetts Port Authority (Massport), Boston Department of Transportation (BTD), and other interested parties. In addition, the study developed modifications of transit proposals previously advanced by private developers. The involved parties reached a consensus that any new service must emphasize connections to current MBTA rail lines, providing service for as many regional corridors as possible with a minimum of transfers. Like the South Boston Piers development, the system must tie into the fabric of downtown Boston.

The feasibility study concluded that substantial public transportation improvements would be required to support proposed development in the South Boston Piers area. Based on analysis of various transit alternatives in terms of right-of-way, ridership, cost, implementation, and urban design issues, the MBTA recommended that a formal environmental impact analysis be initiated to enable a comprehensive evaluation of viable alternatives.

As the first step in the environmental impact analysis process, an ENF was noticed in the *Environmental Monitor* on November 12, 1987, and two state scoping meetings were held on December 10, 1987 at the Federal Reserve Building. As a result of this state scoping process and based on the conclusions and recommendations of the feasibility study, a DEIR<sup>2</sup> was initiated pursuant to MEPA requirements. The DEIR was intended to provide a conceptual analysis of various long-term approaches for the extension of transit service to the South Boston Piers area.

The DEIR was issued in September 1989 to Massachusetts government agencies, interested organizations, and citizens. The availability of the DEIR was announced in the *Environmental Monitor* on November 24, 1989. A 45-day public comment period was provided, and a public hearing was held on January 17, 1990. Comments were received from 29 reviewers, including federal, state, regional, and local agencies, business organizations, private businesses, and the general public.

The Secretary of Environmental Affairs issued a Certificate on February 12, 1990, finding that the DEIR adequately and properly complied with the MEPA and its implementing regulations, and stipulating requirements for the FEIR. Prior to initiation of the FEIR, however, the MBTA submitted an application to the Federal Transit Administration (FTA, formerly the Urban Mass Transportation Administration) to advance the South Boston Piers/Fort Point Channel Transit Project into the federal alternatives analysis/Draft Environmental Impact Statement (AA/DEIS) in accordance with the National Environmental Policy Act (NEPA) and its implementing regulations.

<sup>&</sup>lt;sup>1</sup> Massachusetts Bay Transportation Authority. South Boston Piers/Fort Point Channel Area Transit Feasibility Study. Prepared by URS Corporation. June 1987.

<sup>&</sup>lt;sup>2</sup> Massachusetts Bay Transportation Authority. *South Boston Piers/Fort Point Channel Alternatives Draft Environmental Impact Report.* EOEA Number 6826. Prepared by URS Consultants, Inc. September 1989.



In August 1990, the MBTA's application to advance the South Boston Piers/Fort Point Channel Transit Project was approved by the FTA. Based on the analysis and results of the DEIR, a subset of alternatives was recommended for analysis as part of the federal process. A Notice of Intent describing the project and the alternatives to be analyzed was published in the *Federal Register* on October 23, 1990. Given that a year had lapsed since publication of the project's DEIR, the MBTA and MEPA agreed that the DEIS would also serve as a supplement to the earlier DEIR. A federal scoping session for the DEIS was held on November 8, 1990 at South Station, Boston.

The DEIS/SDEIR was circulated for review in November 1992. A public comment period lasting 45 days was provided, and a public hearing was conducted on December 9, 1992. Comments were received from 27 reviewers of the DEIS/SDEIR, fourteen of whom explicitly supported the MBTA's locally preferred alternative for the project. On January 13, 1993, the Secretary of Environmental Affairs issued a certificate finding the DEIS/SDEIR adequate and in compliance with the MEPA and its implementing regulations; the Certificate also provided requirements for preparation of the FEIR.

The DEIS/SDEIR proposed the joint construction of a portion of the Transitway with the northbound Central Artery in the Dewey Square area. Benefits of such joint construction were measured in terms of substantial reductions in construction impacts and costs associated with both projects. However, due to the design and bid schedule for the joint construction segment that preceded issuance of the transit project's FEIS/FEIR, an EA/NPC was prepared for Transitway elements proposed to be included in the MHD's Central Artery/Tunnel (CA/T) Project C11A1 construction contract, "I-93 Northbound Tunnel Atlantic Ave." These Transitway elements included the tunnel extending beneath Atlantic Avenue from Essex Street to 200 feet south of Congress Street, the turnaround loop at South Station, and utilities relocation in Dewey Square. The EA/NPC showed that construction of these Transitway elements jointly with the northbound Central Artery resulted in no negative environmental impacts beyond those already identified and proposed for mitigation by the CA/T Project. The EA/NPC was issued in April 1993, and notice of its availability was published in the *Environmental Monitor* on May 10, 1993. The Massachusetts Secretary of Environmental Affairs granted a Phase I waiver for the EA/NPC in its Final Record of Decision on July 15, 1993.

The FEIS/FEIR was formally issued on December 22, 1993 when its availability was published in the *Environmental Monitor*. A public meeting on the FEIS/FEIR was held on January 12, 1994. The Secretary of Environmental Affairs issued a Certificate on February 16, 1994 finding that the FEIS/FEIR adequately and properly complied with the MEPA and its implementing regulations.

Following issuance of the Certificate, reconstruction of South Station to accommodate the new Transitway station was incorporated into the C11A1 construction contract; impacts and mitigation for reconstruction of South Station were fully addressed in the FEIS/FEIR. Inclusion of this additional Transitway element in C11A1 reflected a mutually shared objective of the MBTA and CA/T Project to minimize disruption in the Dewey Square/South Station area.

The Secretary's Certificate on the FEIS/FEIR requires that certain outstanding issues be resolved in the project's Draft Section 61 Finding, and that the Finding also address questions received from the various commenters. These issues are addressed herein.



Lieutenant Governor

James J. Kerasiotes Secretary and MBTA Chairman John J. Haley, Jr. General Manager

October 1994

RE: South Boston Piers/Fort Point Channel Transit Project

> **Draft Section 61 Finding EOEA Number 6826**

Governor

To The Reader:

Enclosed for your information is the Draft Section 61 Finding for the Massachusetts Bay Transportation Authority's (MBTA) South Boston Piers/Fort Point Channel Transit Project. The Draft Section 61 Finding summarizes the project's environmental impacts, and the measures proposed by the MBTA to mitigate negative impacts. The document also responds to all written comments received on the project's Final Environmental Impact Statement/Final Environmental Impact Report (FEIS/FEIR). The FEIS/FEIR, which was published in December 1993, was found adequate and in compliance with the Massachusetts Environmental Policy Act (MEPA) and its implementing regulations in a Certificate issued by the Massachusetts Secretary of Environmental Affairs on January 12, 1994.

The MBTA invites written comments on the Draft Section 61 Finding for a period of 30 days after the publication of the notice of availability in the State Environmental Monitor. This public review period will end on November 23, 1994. Any written comments should be submitted by that date to:

> Secretary, Executive Office of Environmental Affairs 100 Cambridge Street, Room 2000 Boston, Massachusetts 02201

Attention:

MEPA Unit: EOEA No. 6826

(617) 727-5830

We appreciate your ongoing cooperation and involvement in this project. If you have any questions regarding the Draft Section 61 Finding, please contact Ms. Mary R. Ainsley, Project Manager, Design and Construction Department, MBTA, at (617) 722-6124.

Sincerely,

General Manager

enclosure



# Project Decisions

Based on continued project planning and design, environmental analysis, and coordination with agencies involved in project review and permitting, the FEIS/FEIR refined the Transitway alignment and resolved most issues raised in the DEIS/SDEIR. At the conclusion of the FEIS/FEIR, however, two key decisions about the Transitway remained: (1) whether to acquire or underpin the New England Seafood Center and (2) selection of one of two sites analyzed in the FEIS/FEIR for location of the Transitway Project's storage and maintenance facility. The MBTA has made decisions on each of these issues as described below.

## The New England Seafood Center

The New England Seafood Center is located on a 4.4-acre parcel at 145 Northern Avenue and is bordered by the East Service Road on the west, B Street on the east, and Congress Street (and the proposed New Congress Street) on the south. The land and building are owned by eight partners of the Massachusetts partnership known as the New England Seafood Center Associates.

The Center consists of a brick and concrete structure containing fish processing and wholesale distribution companies, as well as a nightclub in the northermost portion of the building. The building contains approximately 85,600 square feet and was built in two sections. The section that fronts on Northern Avenue was constructed in 1954, and the rear portion was constructed in 1970.

The building has loading docks on the east, west, and south sides. Truck access is maintained around the entire building. The non-fish tenant, the nightclub known as "Polly-Estas," also has a loading dock where beverages are handled. All loading docks required for fish processing require refrigeration. The portion of the lot that is not utilized by either the building, access ways, or loading docks is occupied by parking spaces used by employees and occasional visitors. In the evening, the lot is also used by patrons of the nightclub.

Two options have been considered relative to the construction of the Transitway Project through the New England Seafood Center property. These include acquiring the Seafood Center and subsequently demolishing it during construction, or structurally underpinning the building and constructing the tunnel beneath it. Although the Seafood Center does not lie within the South Boston Designated Port Area (DPA), it does lie within Chapter 91 jurisdictional boundaries, and acquisition would thus raise the issue of involuntary displacement of water-dependent uses pursuant to 310 CMR 9.36. Acquisition and demolition of the building would require the relocation of all tenants. Additionally, building demolition would result in an expansion of the anticipated area of construction-related disruption and an increase in the project-related volume of demolition wastes. Underpinning would not require the relocation of the tenants and would avoid the associated impacts of building demolition.

Upon completion of the project's FEIS/FEIR, the MBTA further investigated the two options for the New England Seafood Center, working closely with agencies such as Massport, MHD and the CA/T Project, BTD, BRA, and the Economic Development and Industrial Corporation (EDIC), as well as with the Seafood Center owners and occupants. Issues regarding future land uses, roadway

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improvements, construction schedules, and costs were discussed and evaluated. Since this coordination effort did not result in an acquisition plan that was acceptable to all parties, the MBTA proposes to underpin, rather than acquire, the New England Seafood Center. Underpinning, which will not require the relocation of Seafood Center tenants, is technically feasible and is less expensive than an acquisition.

The MBTA recognizes that construction of the Transitway tunnel through the New England Seafood Center property will require coordination with a number of parties, including area property owners. adjacent businesses, and nearby construction projects. A conceptual design for the proposed underpinning of the Seafood Center consists of jacking pipepiles under the existing foundation and constructing steel framing for support of the building. This method requires jacking and receiving pits on the east and west sides of the building, which must be accessible to the surface. All other work will occur underground and will have little or no effect on the structure during and upon completion of construction. During construction, access to the jacking and receiving pits will require close coordination with the Seafood Center tenants to ensure adequate loading dock space, access around the site, maintenance of power for refrigeration, and parking. Any potential disruption of operations during MBTA construction will require mitigation by the MBTA. The MBTA will work with tenants of the Seafood Center, the CA/T Project, and other adjacent projects as the underpinning scheme is designed to further identify impacts and mitigation. Maintenance of traffic plans during underpinning of the Seafood Center by the MBTA will consider such mitigation measures as accommodation of Center truck traffic in adjacent streets, construction during nighttime hours, offsite parking, and loading area reconfiguration. These maintenance of traffic plans will be coordinated with any plans approved for the CA/T Project.

#### **Maintenance Facility Siting**

In the FEIS/FEIR, the MBTA analyzed two potential sites for the Transitway Project's maintenance and storage facility. Site A is located at the corner of Summer Street and Pappas Way, while Site B is located on West First Street between E Street and Pappas Way; both sites are located within Chapter 91 jurisdiction. These two sites were screened from a larger number of potential sites, and both were deemed appropriate for location of a maintenance and storage facility to support the Transitway Project.

After several meetings with Massport and Pappas Management Corporation, the owners or representatives of the owners of the two sites under consideration, the MBTA has selected Site B on West First Street for location of the Transitway Project's maintenance and storage facility. The site is preferable over Site A given that no impact to existing water-dependent uses would result. Site B also meets several other important design criteria:

Selection of this site will not displace any existing water-dependent use. This criterion is particularly important, since the economic vitality of South Boston depends in large part on the area's water-dependent businesses and industries. A portion of Site A located at the corner of Summer Street and Pappas Way is currently used for Subaru overflow vehicle parking; since these vehicles are transported by water, this overflow parking lot is determined to be a water-dependent use. Although Site B is also within Chapter 91 jurisdiction, it does not contain any existing water-dependent uses. It is therefore a more desirable location for the Transitway's maintenance facility. Tenants of the site, which is

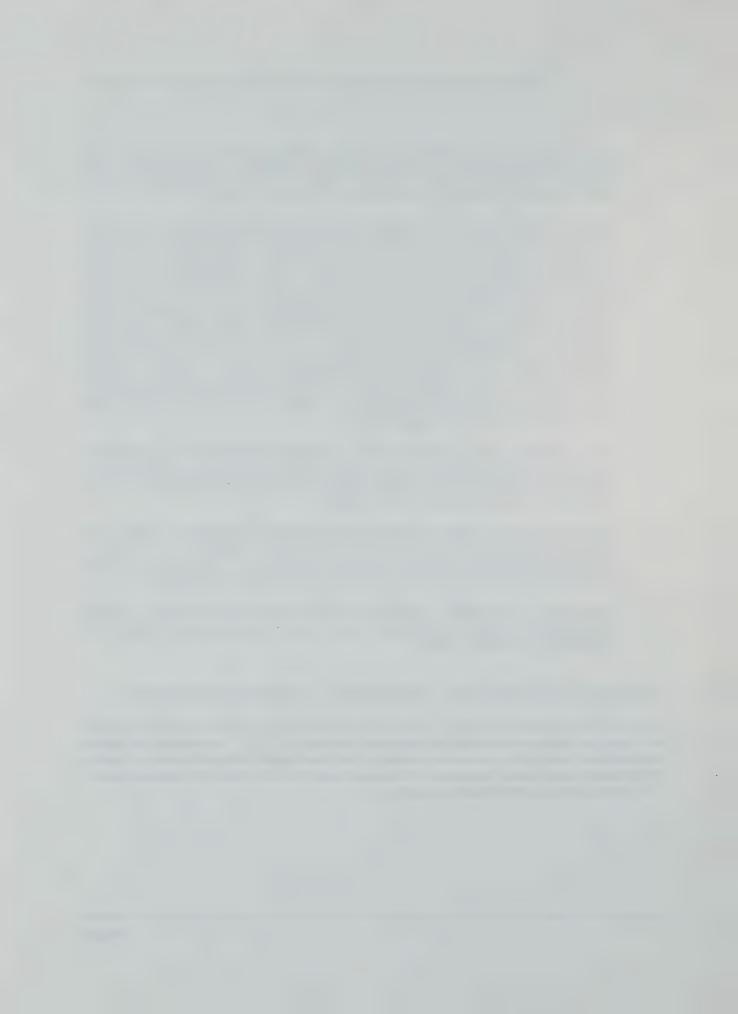


predominantly owned by Massport and partially owned by Atlantic, Inc., include Fortress Records, Corporate Printing Company, Shaughnessy Warehouse, Roadway Trucking, PPG Industries, Yankee Bus, Emerson College, NYNEX, U.S. Postal Service parking, Boston Harbor Industrial Development Corporation and E Street Associates.

- The site is roughly one-half mile from the Transitway portal, and is located along a future Transitway route to residential South Boston as part of the full build configuration. This location thus minimizes non-revenue producing trips (i.e., "deadheading") for transit vehicles beginning or ending their service routes. It also reduces the need to install additional catenary (overhead wires that provide electrical power to the trackless trolley vehicles) as part of the full build Transitway to extend surface service into residential South Boston; catenary will simply be extended from the West First Street facility. The ability to utilize the same catenary for non-revenue trips to the maintenance facility and revenue trips into residential South Boston as part of the full build Transitway will reduce both one-time construction and ongoing operating and maintenance costs. In addition, combined use of the catenary will limit potential adverse environmental impacts, including visual and aesthetic impacts of the overhead catenary and support structures. This is an important issue as the Piers area streetscape evolves.
- The surrounding area is compatible with activities associated with the Transitway's maintenance and storage facility. The site is adjacent to other light industrial development, and the area in which it is located is expected to remain in such use for the long-term. No residential or commercial areas will be affected.
- The site is physically suited to development as a maintenance and storage facility. There
  are a few structures on the site that would need to be removed. Utility service is
  adequate, eliminating the need for costly infrastructure work. The parcel is regularly
  shaped, enabling its efficient use for construction and operation of the facility.
- No hazardous waste spills or releases were identified at this site, based upon review of files of the U.S. Environmental Protection Agency and the Massachusetts Department of Environmental Protection (DEP).

# Response to the Certificate of the Secretary of Environmental Affairs

The Secretary's Certificate (February 16, 1994) requires the MBTA to respond, in this Draft Section 61 Finding, to certain issues raised by commenters on the FEIS/FEIR. These issues include the two decisions — acquisition versus underpinning of the New England Seafood Center and location of the maintenance facility. Resolution of those two decisions is provided in the previous section. This section sets out other required responses.



#### **Location of Courthouse Station**

The Secretary has stated that "[t]he MBTA should examine the option of relocating the headhouses of the Courthouse Station to signalized intersections at Pittsburgh or Sleeper Streets. Alternatively, if the headhouses cannot be relocated, the MBTA should consider additional measures to improve safety at the mid-block location."

The MBTA has met with public agencies, including the BTD, BRA, MHD, and the General Services Administration, and private interests, such as the McCourt-Broderick Limited Partnership and the Children's Museum, to address concerns about Courthouse Station as documented in comment letters submitted on the project's FEIS/FEIR. Issues discussed with these public and private interests include safety, pedestrian access, and future development in the Piers area. After consideration of the various concerns and competing interests identified and discussed in these meetings, the MBTA has determined that the location of the Courthouse Station, including the headhouses as proposed in the FEIS/FEIR, is appropriate, and should not be changed. However, other mitigation measures to address concerns expressed during meetings with public and private interests will be implemented. These measures are discussed later in this section, following a brief description of the rationale for the proposed Courthouse Station siting decision.

The two Piers area Transitway stations — Courthouse and World Trade Center Stations — were sited to provide maximum transit coverage of the area. These stations were sited by the MBTA with input from state and city planners, including the BRA and Massport, as well as from Piers area property owners and developers.

Alternative locations for Courthouse Station at Sleeper and Pittsburgh Streets were considered during station siting. Neither of these locations is as advantageous as the proposed Farnsworth Street location. Of primary importance is that the Courthouse Station be as close as possible to the new Federal Courthouse. The proposed Farnsworth Street location is directly opposite (although a block away from) the main entrance of the Courthouse. Although a Courthouse Station shifted west to Sleeper Street would be dramatically sited on the waterfront, engineering for such a shift is not feasible for a number of reasons.

Specifically, the proposed Courthouse Station platforms are located on a tangent (*i.e.*, straight) section. Moving the station west would place the platforms on a curve. Since a tangent section is required for station platforms, the Transitway alignment west of Sleeper Street would need to be redesigned. Such a realignment is not feasible, however, since it would result in an adverse impact to the abutment of the New Northern Avenue Bridge. Alternatively, the current proposed platform location could be maintained, and the headhouses relocated to Sleeper Street. This extension of the accessways to Courthouse Station would result in a much larger and more costly station. Furthermore, the construction of the New Northern Avenue Bridge immediately adjacent to Sleeper Street headhouses would pose safety problems for transit passengers entering or exiting the station. Cars coming off the incline of the New Northern Avenue Bridge will reach grade at the intersection of Sleeper Street and New Northern Avenue. As cars come down the incline, they are likely to be accelerating. Similarly, as motorists approach the bridge incline, their natural instinct would be to accelerate. The safety of Transitway station users and other pedestrians could be jeopardized by the six lanes of accelerating traffic and motorists with poor sight lines at the intersection of Sleeper Street and New Northern Avenue.



A station location at Pittsburgh Street would be located too far from the Federal Courthouse, existing development along the western edge of the Fort Point Channel, and a potential future water shuttle terminal at Fan Pier. It is desirable from both wayfinding and urban design perspectives that the headhouses be as close as possible to, and visible from, the channel and the Fan Pier. Along with the future Federal Courthouse, these are two of the Piers area's strongest geographical features.

The Courthouse Station location at the western edge of the Piers area was chosen specifically to serve existing developments, including Museum Wharf (consisting of the Children's Museum, Computer Museum, and Boston Tea Party Ship Museum) and the Boston Wharf Company. Approximately one-third of existing development in the Piers area is focused there. This development consists primarily of office uses, which generate a high level of trip demand per square foot of development.

A one-quarter mile walk radius was used to analyze station locations with respect to their ability to serve area development. To avoid overlap of these radii and maximize the cost-effectiveness of the project, the two stations were spaced roughly one-half mile apart. The northwest entrance to Courthouse Station is located across from the new Federal Courthouse at Fan Pier (within a two-minute walk distance), and a southwest entrance provides access to the Boston Wharf Company buildings and to Museum Wharf. Using a one-quarter mile walk distance, Courthouse Station will also serve developments in the easternmost portion of the Financial District, including International Place.

In their comments on the Transitway's DEIR, officials from the Computer Museum stressed that the Courthouse Station should remain as close to Museum Wharf as possible. Museum Wharf currently attracts over a million visitors each year, and museum directors believe that convenient, accessible transit is likely to capture a considerable portion of these visitors and Museum staff if the service meets their needs. Needs include a short walk distance from the Transitway station, and easily accessible vehicles that can accommodate strollers, baby carriages, and wheelchairs. Future transportation developments, such as water shuttle services expected to dock at Fan Pier, and the existing Northern Avenue Bridge, which is proposed for conversion as an enhanced pedestrian walkway, would also be well-served by station headhouses in the vicinity of Farnsworth Street.

Based on these factors, the MBTA believes that the Piers area would be ill-served by a relocation of Courthouse Station. While the MBTA recognizes that pedestrian safety is of paramount concern given the midblock location of station headhouses in the vicinity of Farnsworth Street, such headhouse locations have been successful elsewhere in the MBTA system. For example, the Kendall and Kenmore Stations are at mid-block locations. Easy access to these stations is achieved in several ways. At Kenmore Station, headhouses on either side of Commonwealth Avenue lead to a mezzanine, while passengers accessing Kendall Station are eased across the highly defined mid-block crossing by flags set into the median of Main Street in Cambridge and a pedestrian actuated signal.

As described in the FEIS/FEIR, Courthouse Station will be designed with a mezzanine accessible from headhouses on both sides of New Northern Avenue. Other mitigation measures that the MBTA commits to implement with approval from such agencies as the BTD include the following:

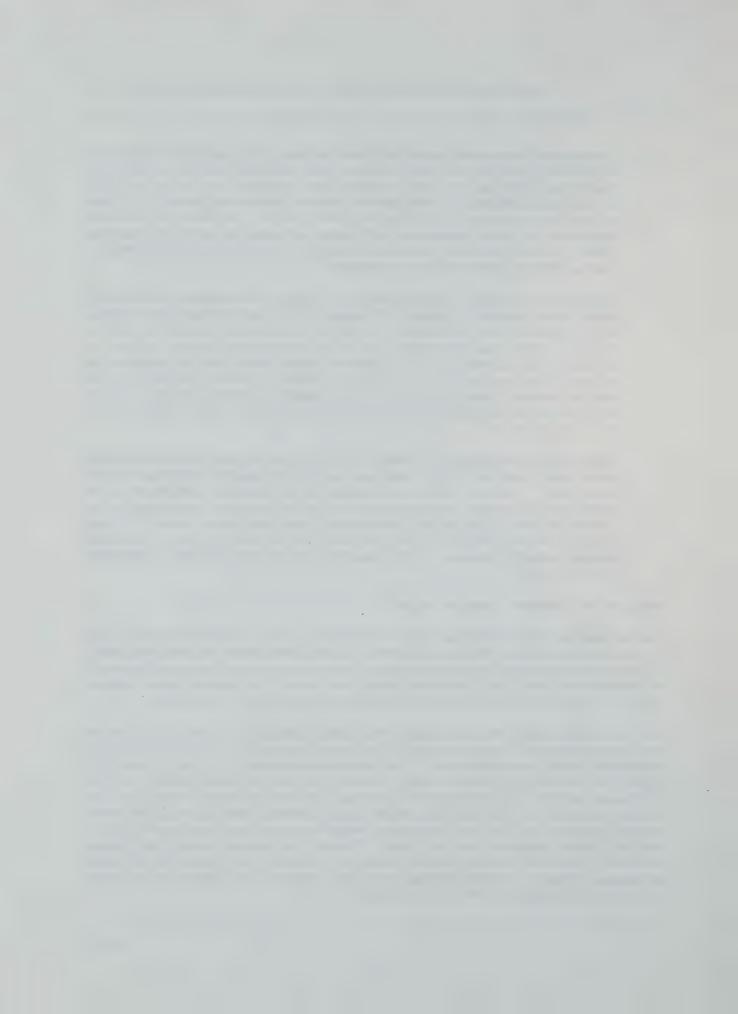


- Courthouse Station entrance/exit at Pittsburgh Street. The headhouse located at the southeastern corner of New Northern Avenue and Pittsburgh Street will be open as a Courthouse Station entrance/exit. Previously, this headhouse was designated as an emergency exit only, with the main station entrance/exit headhouses located on both sides of New Northern Avenue in the vicinity of Farnsworth Street. The designation of all three headhouses for station entrance/exit will improve pedestrian circulation at Courthouse Station, and will now allow pedestrians to access the station at the New Northern Avenue/Pittsburgh Street signalized intersection.
- Installation of a barrier. A fence or other barrier along the New Northern Avenue median would prevent mid-block crossings. The current median plan for New Northern Avenue does not provide for any such barrier. The MBTA will work with other agencies, such as the BRA, on the final landscaping plan for the New Northern Avenue median. In combination with a median barrier, a pedestrian actuated signal could be installed at the midblock headhouse location. A change in the color and material of the crossing could also be provided to alert motorists that this is a pedestrian crossing. At a minimum, the crosswalk striping here should be very wide so motorists have a strong visual cue that crossings may occur.
- Clear signage and graphics. Provision of clear signage and graphics both at the station level underground and at the street level will greatly facilitate communication with pedestrians. Prominent below level signage will direct exiting passengers to the appropriate side of New Northern Avenue so they can reach their destinations without crossing the street at the surface. Headhouses at street level will be marked by a strong and highly visible design. It is also the intention of the MBTA to have a community relations person in the station to answer questions and direct station users to destinations in the Piers area.

#### **Design of the Transitway Catenary System**

The Secretary has stated that "[t]he design of the catenary system in the eastern section of the project will need to consider the special requirements of the Boston Marine Industrial Park (BMIP). The system must be designed to accommodate the movement of large heavy equipment necessary for the operations at the BMIP. In addition, as the project makes a transition into more residential areas, the urban design elements should be sensitive to the residential neighborhood."

Inherent in the trackless trolley technology is the overhead catenary system with its supports and power supply elements. Appropriate design of this system incorporated into the streetscape can enhance the project's aesthetic impact. To mitigate any potential negative aesthetic impacts of the project, the Transitway's surface catenary system will be designed in conjunction with other streetscape elements in the South Boston Piers area. The MBTA is currently working with, and will continue to work with, the South Boston Streetscape Committee which has been convened to develop a design for the Piers area's streetscape; committee members include representatives from the City of Boston, Massport, and CA/T Project. The MBTA will integrate design of the catenary system associated with surface operation of Transitway trackless trolley vehicles with the area's streetscape elements, including lighting, trees, and signage. This integration will ensure compatibility and cohesion of the area's streetscape.



Design specifications for the Transitway catenary system will be established to accommodate the operation of trucks and heavy equipment on the surface streets. The special requirements of BMIP, which involve the operation of cranes and other heavy equipment associated with maritime industries, will require particular attention as design specifications are developed. Extension of Transitway service into residential South Boston, scheduled for the year 2008, will also require sensitive design solutions. Overhead catenary on South Boston neighborhood streets will be designed to be consistent with the scale and residential character of the area. However, the potential exists that an alternative, non-catenary, propulsion system may be available for revenue service on this residential South Boston route by 2008. The MBTA will evaluate any appropriate new technology as design on this segment of the Transitway is advanced. In addition, the MBTA will continue to work with BMIP and the South Boston residential community as design of the surface Transitway routes progresses.

#### **Boston Transportation Department Comments**

#### D Street Corridor and Massport Haul Road/D Street

The Secretary has recommended that "[t]he MBTA meet with representatives of the Massachusetts Highway Department (MHD), Massport and BTD to explore alternative circulation patterns at [the D Street/Massport Haul Road] location."

In the South Boston Piers Transit Project's FEIS/FEIR, the intersection of D Street and Massport Haul Road was shown to operate at level of service (LOS) E in the initial build Transitway only. The LOS E rating, which does not indicate an intersection failure, is due in part to the operation of surface shuttle buses needed in the initial build Transitway to provide connections between the Piers area and rapid transit transfer stations in midtown Boston. These shuttle buses are eliminated once the full build Transitway is extended to the Orange and Green Lines at Chinatown Station and Boylston Station, respectively, and the Massport Haul Road/D Street intersection was shown to improve to LOS D.

Since traffic analysis for the transit project's FEIS/FEIR was prepared, however, the CA/T Project has performed additional analysis of traffic circulation in the Piers area. In April 1994, the CA/T Project prepared a *South Boston Truck Access and Circulation Study* to support the project's Consolidated Chapter 91 license application. The truck study was based on the CA/T Project's Proposed Action as approved by the Secretary of Environmental Affairs in his Certificate dated January 2, 1991, and was prepared to assist DEP and other interested parties, including the BTD and the Boston Shipping Association (BSA), in assessing the effect of the CA/T Project on truck access to the South Boston DPA.

Through a D Street corridor analysis, the truck study documented that intersection operations were affected by the queuing of vehicles between the closely-spaced intersections of the D Street corridor, including the Transitway portal. The study proposed to mitigate these conditions by providing a grade separation of D Street and the Massport Haul Road, and by connecting Summer Street and the Massport Haul Road by a new "Pumphouse Connector Road" opposite E Street.

During the process of addressing DPA truck access issues, Federal Highway Administration (FHWA) concerns regarding the preliminary design for this area of the CA/T Project were being



addressed. Resolution of the FHWA concerns resulted in proposed design refinements to the CA/T Project's Proposed Action. Accordingly, the CA/T Project initiated an amended truck study in June 1994 based on a traffic network that includes the design refinements, and also includes the two proposed mitigation measures for the D Street corridor (grade separation of D Street and Massport Haul Road and construction of the Pumphouse Connector Road). As with the April 1994 truck study, the traffic networks showing traffic volumes in the amended truck study area include the Transitway operations.

At the same time, the CA/T Project initiated an indepth coordination process with state and city transportation agencies and interested parties on both the amended truck study and a Notice of Project Change (NPC) for the design refinements to the project. Coordination includes a series of meetings that will be ongoing during the period of preparation of both the amended truck study and the NPC. Parties invited to participate in the process include the MBTA, Massport, DEP, BTD, BRA, EDIC, BSA, and The Boston Harbor Association.

As of August 31, 1994, four coordination meetings were held, which are temporarily suspended due to the CA/T Project's consideration of further design refinements. Thus far, the scope, methodology, and network assumptions for both the amended truck study and the NPC have been discussed at these meetings. The CA/T Project is currently preparing responses to questions raised and to various participants' requests for additional traffic-related information. Sensitivity analyses are also being prepared to respond to specific issues raised during the meetings. The CA/T Project expects to resume the meetings in the near future. Future meeting agendas include review of traffic analyses and findings, and review of traffic mitigation measures and implementation requirements for both the amended truck study and the NPC.

This public process provides exceptional opportunities for the participants to share in the development of the traffic analyses for the amended truck study and the NPC, to contribute to the process of ascertaining the causes contributing to potential traffic problems, and to identify appropriate mitigation measures. The focus of the truck study and any amendments is to ensure that truck access to port areas is maintained throughout CA/T Project construction and in the full build design year of 2010. The CA/T Project construction period coincides with Transitway construction, and operations of both the Transitway and Third Harbor Tunnel will continue in the 2010 design year. Through its participation in the development of the amended truck study, the MBTA will ensure that Transitway construction impacts and operations are fully addressed, and any combined impacts are mitigated in a coordinated and effective manner. Thus, BSA and BTD concerns will be addressed through this process.

#### Angle Parking on New Congress Street Under the Bus/TSM Alternative

The Secretary has stated that "BTD also noted that information it requested on the proposed angle parking on New Congress Street was not included in the FEIR/EIS."

No angle parking on New Congress Street is contemplated as part of the Transitway Project. Angle parking on New Congress Street was proposed as part of the Bus/Transportation System Management (TSM) Alternative defined in the FEIS/FEIR. Such a parking arrangement was necessitated under this alternative as the result of the proposed construction of a bus lane on New Congress Street. To permit construction of this bus lane, curb lane parking was proposed to be



moved to the median of New Congress Street and arranged in an angle configuration in order to avoid a loss in the net number of relocated spaces.

The MBTA recognizes the undesirability of a bus lane in the curb lane and angle parking along the median of New Congress Street. The BTD, BRA, and City of Boston Environment Department (BED) all expressed serious concerns about TSM measures deemed necessary by the MBTA as part of the Bus/TSM Alternative to support transit demand in the Piers area. In part as a result of these concerns, the MBTA rejected the Bus/TSM Alternative in favor of the full build Transitway as the locally preferred alternative for the project; however, the definition of the Bus/TSM Alternative was not altered in the FEIS/FEIR. The MBTA does not advocate the creation of angle parking if traffic safety is compromised. Again, angle parking is not proposed as part of Transitway Project implementation.

## **Boston Shipping Association Comments**

The Secretary has stated that "the comments of the Boston Shipping Association (BSA) are particularly critical of the traffic assessment and mitigation related to providing adequate access for trucks to and from the port. In particular, conflicts between bus operations and truck operations at key intersections may require further mitigation. The roadway segment from Summer Street to Northern Avenue at D Street Extension is of specific concern to the Shipping Association."

In response to criticism received from the BSA and others on the traffic assessment and mitigation developed by the CA/T Project for the South Boston's DPA as described in the project's draft *South Boston Truck Access and Circulation Study* of January 1994, the CA/T Project published a substantially revised final report in April 1994. This final report, which was based on the CA/T Project's 1991 FSEIS/R in accordance with Chapter 91 license requirements, addressed issues raised by BSA and others, including performance of corridor analysis for D Street between Summer Street and Northern Avenue. As described above on pages 13 and 14 ("D Street Corridor and Massport Haul Road/D Street"), the MBTA, BSA, Massport, BTD, and others all participated in the preparation of this final report, and are currently participating in revised analysis based on the CA/T Project's proposed action to be documented in a forthcoming NPC.

In addition, the MBTA has met with the BSA to discuss the potential impacts of the Transitway's surface component on trucks operating in the DPA. The Transitway has been designed with the goal of reducing total passenger vehicle traffic in the South Boston Piers area. This goal is served by attracting riders to high occupancy vehicles and by placing these vehicles in a tunnel in the most congested parts of the area. Surface operation of the Transitway vehicles and supplemental buses in the eastern portion of the Piers area is also designed to avoid conflicts with truck operations in this area. Achievement of these goals is evidenced by a significant reduction in surface congestion resulting from Transitway implementation as compared to the no action scenario. The MBTA has shown that without the Transitway, three intersections in the project area operate at LOS E, and another three operate at LOS F. In contrast, the initial build Transitway significantly reduces traffic congestion; no intersection failures occur, and only one intersection was shown in the FEIS/FEIR to operate at LOS E. (It should be pointed out that this LOS E intersection is at D Street and Massport Haul Road, the intersection that has been proposed for grade separation by the CA/T Project as part of their South Boston Truck Access and Circulation Study.) Once the full build Transitway is constructed, all intersections in the project area were shown to operate at LOS D or



better. Thus, the Transitway clearly has a beneficial impact on surface congestion in the South Boston Piers area and the DPA. The MBTA will continue to work with the BSA, BTD, and CA/T Project as plans for Transitway implementation are advanced to ensure that any potential conflicts between Transitway surface operations and trucks are minimized and appropriately mitigated.

#### Coordination with Central Artery/Tunnel Project

The Secretary has stated that the MBTA and MHD "should work together to improve communication .... and mitigation commitments [should be] based on shared data and joint analysis, and should be responsive to the comments of ... the Atlantic Avenue Abutters Group." In addition, coordination between the projects was identified as "critical to the [MBTA's] Phase I waiver obligations."

Coordination between the MBTA and the CA/T Project has been rigorous and ongoing. The MBTA and CA/T Project meet both regularly and on an ad hoc basis to discuss issues relevant to both projects. This coordination has yielded numerous benefits, most notably an agreement by the MBTA and MHD to jointly construct the Transitway and northbound Central Artery in Dewey Square as part of the CA/T Project's C11A1 contract. Joint construction of the two projects affords considerable cost savings to the state and substantially reduces the environmental impacts that would otherwise be associated with two separate major construction projects.

Such coordination, including involvement by the Atlantic Avenue Abutters Group in the development of a construction mitigation plan for Dewey Square, also satisfies requirements of the MBTA's Phase I waiver which permits accelerated coordinated construction of the Transitway and northbound Central Artery as part of the C11A1 contract.

As part of C11A1, the MHD will construct Transitway elements, including utilities relocation, the Transitway station and turnaround loop at South Station, and tunnel from Essex Street to 200 feet south of Congress Street. Since publishing the FEIS/FEIR in December 1993, there has been much progress in the development of construction staging plans, the location of work zones, and the facilitation of pedestrian movements during construction, particularly to the South Station/Dewey Square area. The phasing plans also maintain Red Line operations during construction.

The MBTA, CA/T Project, BTD, and Atlantic Avenue Abutters Group have coordinated to develop a vehicular and pedestrian traffic mitigation plan for the Dewey Square/South Station area. In late 1993, the CA/T Project and MBTA commenced weekly meetings with the Abutters Group and BTD (separate and combined) to communicate and coordinate the construction phasing and sequencing, focusing on traffic and pedestrian mitigation. In addition, the comprehensive coordination process established by the CA/T Project and MBTA has involved meetings with abutters, including the Federal Reserve Bank, One Financial Center, and Beacon Management, on an individual basis to address those companies' special concerns. By the end of March 1994, with contributions from the Abutters Group and BTD, the CA/T Project and MBTA completed the preliminary construction phasing plans for the C11A1 contract.

The construction phasing documents reflect mitigation measures to address as many of the concerns as possible that were communicated during the coordination process. One concern that was discussed in detail was the need to occupy all four corners of Dewey Square during a portion



of one construction phase, for a period of approximately six months. Limiting construction to three corners was demonstrated to the Abutters Group as having significant schedule and cost impacts, totalling an additional six months of construction at an additional cost of \$10 million. As a result of these adverse impacts, it was concluded that limiting construction to only three corners during all phases of construction was not feasible.

Mitigation measures agreed to by the CA/T Project, MBTA, and Atlantic Avenue Abutters Group are incorporated in the contract documents for C11A1. The following lists some of the specific items concerning work zones and pedestrian movements that were negotiated by the Atlantic Avenue Abutters Group, MBTA, and CA/T Project:

- Sidewalks dedicated for pedestrian travel around Dewey Square shall remain continuous and unobstructed during the designated restricted periods between 7:00 - 9:00 a.m. and 3:30 - 6:30 p.m. At other times, momentary obstruction of pedestrians for passage of equipment and material over sidewalks may occur. Police details will coordinate the movement of both construction equipment and pedestrians along the sidewalks abutting South Station.
- Work outside of fixed barricade work zones shall only be performed at night, will be properly cordoned off, and will be neatly and safely covered with flush fitting non-slip type coverings for pedestrian use by 6:30 a.m.
- The C11A1 construction staging plans will maximize pedestrian areas wherever possible
  and will be of satisfactory widths to satisfy pedestrian level of service (LOS) analyses.
  Additionally, there will be contract requirements to "pull back" certain sensitive areas when
  possible.
- All sidewalks will be kept clear at all times, and repairs shall be made immediately to remedy any deficient sidewalk surface conditions. Snow and ice will be removed from sidewalks around work areas and be kept free of ice at all times.
- Safe and clearly maintained crosswalks at all major intersections will be provided. The
  project will be coordinated with BTD to assure that all pedestrian crosswalks are given
  appropriate attention.

Additional measures discussed with the Atlantic Avenue Abutters Group to improve access during construction will be included as part of the C11A1 contract documents. These measures, which are contained in the Agreement Between the Massachusetts Highway Department and the Atlantic Avenue Abutters Group as to Goals for Construction Period Maintenance of Pedestrian and Vehicular Environment, will be implemented by the contractor during construction if feasible.

# Compatibility with the North Station-South Station Rail Link

The Secretary has stated that "[d]uring my review of the Phase I waiver request related to construction at Dewey Square, an important consideration was that this early construction did not foreclose future opportunities for the rail link.... The Draft Section 61 Finding should report on the compatibility of the final design of the Transitway project with respect to the North Station-South



#### Station Rail Link."

The MBTA finds that the Transitway and its early joint construction contract at Dewey Square will have no impact on and is fully compatible with the North Station-South Station Rail Link as currently proposed. The current proposed plan shows that the Rail Link will be constructed beneath the depressed Central Artery box, and the Transitway will be constructed above the Central Artery box. Construction of the Transitway in Dewey Square as part of the CA/T Project's C11A1 construction contract will not foreclose future opportunities for the Rail Link. Approval to jointly construct Transitway elements with the northbound Central Artery was received in the Executive Office of Environmental Affair's Phase I waiver following submission and public review of an EA/NPC by the MBTA in April 1993.

# Fort Point Channel Crossing Method

The Secretary has stated that "the construction methodology for work in the Fort Point Channel has not been selected. The comments received on the FEIR/EIS offer many details regarding preferred methods. Consultation with the Massachusetts Coastal Zone Management (MCZM) office and DEP is recommended."

The MBTA has met with the U.S. Army Corps of Engineers (USACOE), MCZM, DEP, and the Conservation Law Foundation to discuss the Fort Point Channel crossing construction methods. Based on these meetings and analysis of both the immersed tube and cofferdam methods, the MBTA has selected the semi-confined concrete immersed tube construction method over the cofferdam as the preferred alternative for the crossing of the Fort Point Channel. This method minimizes total construction duration, in-water construction duration, and costs, and enhances the ability to successfully mitigate environmental impacts. Specifically, the semi-confined concrete immersed tube can be constructed 11 to 13 months faster than the cofferdam; has a 30-week, versus a 68-week, in-water construction period; is estimated to cost \$3.5 million dollars less than the cofferdam method; and can be constructed in an environmentally sound manner, as discussed below. In addition, the use of semi-confined dredging techniques will limit dredged material volumes to amounts similar to those resulting from the cofferdam method.

Immersed tube construction involves channel dredging within a semi-confined area. Two parallel rows of steel sheeting will be driven into the channel bed along the alignment to preclude the necessity of side-sloping excavation. This sheeting will extend approximately six inches above the channel bottom. The channel bed between the rows of sheeting will then be excavated, or dredged, to the necessary depth. Upon proper preparation of the channel bed, a single tube section, constructed off-site and sealed at each end, will be floated into position over the dredged alignment and lowered (or "sunk") into place. Crossing of the channel will require three such sections and will result in a navigational constraint of approximately one-half the width of the channel at any given time. Upon completion of construction, the tunnel will be covered with clean, compatible materials.

The cofferdam construction method differs from the immersed tube method in that all construction would occur in place. This method would have entailed installation of a sheet pile cofferdam across one-half of the Fort Point Channel, while leaving the remaining half of the channel open for tidal flushing and navigation. Once the cofferdam was installed, the confines of the cofferdam



would be cross-braced, dewatered, and excavated to the tunnel design depth; the Transitway tube would then be cast in place. Upon completion of the first half of the channel tunnel, the cofferdam would be removed and construction of the second half of the tunnel initiated. During this process, a portion of the first cofferdam would need to remain in place to maintain continuity between the two halves of the cofferdam crossing. Upon completion of the channel crossing, sheet piles used for the cofferdam would be cut at the mud line and left in place to ensure soil stability in the immediate vicinity of the tunnel.

In accordance with USACOE requirements, Tier 1 (data review) and Tier II (chemical evaluation) reports have been prepared that include descriptions of the Fort Point Channel crossing construction methodologies and sequencing, existing sediment conditions, and sediment dredging and disposal requirements and alternatives. A MCZM Federal Consistency Certification Statement, USACOE Section 404 Permit Application, and Section 401 Water Quality Certification have been filed which detail the construction methodology, sequencing, impacts, and mitigation measures for the preferred immersed tube channel crossing method.

The impact of increased levels of suspended solids on water quality during dredging is the most significant potential impact of the preferred channel crossing method. However, these impacts can be successfully mitigated through the use of silt curtains, modified dredging techniques, and continual water quality monitoring. The MCZM consistency review and USACOE permit applications referenced above detail mitigation measures that include:

- Use of a semi-confined dredging technique to limit the amount of sediments to be dredged and disposed of. Steel sheeting will extend approximately six inches above the channel bottom, preventing slumping of adjacent sediments into the dredged area. This will shorten the dredging period, and will limit the dredge volume to approximately that which would have been generated in the cofferdam alternative.
- Use of a closing clamshell bucket on the dredge. A closing clamshell bucket similar
  to that used for the dredging of the Third Harbor Tunnel across the Boston Inner Harbor
  will help avoid sediment spillage over the top of the bucket and lead to a considerable
  reduction in the level of suspended solids during dredging operations. Water quality
  impacts can be further reduced by using care with the rate of bucket lifting.
- Use of silt curtains around the dredge site that extend to the channel bottom during
  all phases of the tidal cycle. Full depth vented silt curtains extending to the channel
  bottom will be installed around the dredging operation. Opening and moving of the
  curtains will be facilitated by raising the curtain bottom with ropes preattached to the ballast
  chain. Excessive ballooning of the curtains will be controlled by the use of curtain windows
  of sufficient area to allow passage of water through the curtains during tidal changes.
  These windows will be located as close to the flotation as possible to prevent the passage
  of the more turbid lower waters.
- Close and frequent monitoring of water quality at key receptor points. Monitoring of the water quality in the Fort Point Channel will be conducted during the dredging, screeding, and backfilling of the channel crossing project. Turbidity will be continually monitored in the tanks of Neptune Lobster Company and James Hook & Company in the



channel mouth area between Fan Pier and the New England Aquarium, and at the Congress Street Bridge; water quality in the Fort Point Channel will be monitored on a weekly basis. Monitoring will be conducted for turbidity, suspended solids, heavy metals, and polynuclear aromatic hydrocarbon (PAH) compounds at discrete intervals of the water column, including the bottom.

• Development of contingency plans for sea water service for nearby consumers.

Should the amount of suspended solids in the tanks of the two lobster companies be found to exceed a background of 50 milligrams per liter despite the mitigation efforts, temporary intakes will be extended to points beyond the mouth of the Fort Point Channel.

# Coordination with CA/T Project on Disposal of Excavated Material

The Secretary has stated that "the disposal of excavated material should be coordinated with the Central Artery/Tunnel Project."

The MBTA has coordinated with the CA/T Project in evaluating the disposal options for Transitway excavated materials. Analysis of the excavate volumes and rates indicates that adequate capacity exists for suitable material from both projects. Coordination has also occurred between the two projects with respect to shared excavate handling and disposal efforts. As a result of this coordination, it has been agreed that Transitway excavate material generated during work on the joint construction section (C11A1, "I-93 Northbound Tunnel Atlantic Ave.") will be handled and disposed of in accordance with the Memorandum of Understanding (MOU) between the CA/T Project and DEP.

The CA/T Project's MOU with DEP defines the procedures by which the project is to handle, test, treat, and reuse excavate material. As currently envisioned, these materials will be handled in accordance with the CA/T Project's materials processing program for handling excavate materials for reuse. Negotiations between the MBTA, CA/T Project, and DEP are ongoing to identify a mechanism by which the Transitway Project can be incorporated into the MOU.

Opportunities for continued coordination of excavate material from the two projects beyond the C11A1 contract are the subject of ongoing discussion between the MBTA and CA/T Project, and will continue to be explored during the final design and permitting phases of the Transitway Project. Communications with DEP are also being initiated to determine the degree to which the MBTA can participate in the MOU between the CA/T Project and DEP, thereby allowing the co-mixing of both projects' excavate. Although adequate disposal opportunities exist for separate handling and disposal of CA/T and Transitway Project excavate materials beyond the C11A1 contract, the suggested coordination between the two projects on this issue would have practical benefits. Specifically, such coordination could avoid or minimize a duplication of excavate handling and disposal efforts by two state transportation entities conducting similar and proximate excavation projects during an overlapping time frame. Procedures and facilities for the handling and disposal of excavate materials that will be established for the Transitway Project during its final design and permitting phases will reflect the results of this ongoing coordination with the CA/T Project and DEP.



### **Operational Noise Criteria**

The Secretary states that "[t]he MBTA and the Boston Environment Department should meet to determine if the agencies can develop mutually acceptable noise criteria[,] ... report on the results and also clarify how noise will be monitored when the Transitway is operational."

The MBTA has met with BED to discuss the Department's objections to FTA's criteria for acceptable operational noise levels. In general, BED argues in its comment letter on the FEIS/FEIR (and has argued in the past) that the FTA criteria are overly restrictive in urban areas. BED recognizes, however, that the MBTA is obligated by NEPA regulations to prepare its noise analysis in accordance with guidance provided by FTA. Likewise, while the MBTA recognizes BED's concerns with these noise criteria, the Transitway involves operation of rubber-tired vehicles in an underground tunnel, and operational noise is not expected to become an issue. The MBTA is in the process of developing a new noise policy aimed at directing the Authority's approach to identifying and mitigating noise problems. This new policy, which is described in more detail on page 26, will govern the monitoring of Transitway operational noise. A monitoring program could consist of periodic (once or twice a year) measurements of noise levels at sensitive receptor locations in the vicinity of Transitway operations.

### **Alternative Financing**

The Secretary has stated that "[i]t appears that the funding of the project, through the Federal Transit Administration, may not be fully available over the planned implementation period. Based on the anticipated negative impacts associated with the two MOS alternatives, I urge the MBTA to consider alternative financing that would ensure timely implementation of the project."

In the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, \$278 million of federal funds were authorized for the Transitway Project. These federal funds are earmarked for construction of the Transitway initial build segment from South Station to the World Trade Center. As noted in the FEIS/FEIR, federal funds currently authorized cover approximately 64 percent of the Transitway initial build capital costs. The MBTA, with Congressional support, submitted a request in January 1994 for an additional \$72.7 million in federal authorization for the project. These additional dollars will bring the total ISTEA authorization to 80 percent of Transitway initial build capital costs. In the event that federal funds are delayed, the state could assume an increased share until such time as federal funds become available.

Given the high level of federal funding expected for the initial build segment and the aggressive schedule for the opening of revenue service in the year 2000, no alternative financing mechanisms are anticipated for the initial build Transitway. Such mechanisms may be more appropriate for extension of the Transitway to Boylston Station in the project's full build configuration.

To date, no federal dollars have been authorized by Congress for the full build segment of the Transitway extending from South Station to Boylston Station. The schedule for this segment anticipates design work beginning in the year 2000, with a construction start in 2003. The MBTA will work with its Congressional delegation to secure federal funds for this segment of the Transitway Project; 80 percent federal participation will be sought. In addition, the MBTA will continue to pursue alternative sources of funding for the project such as joint development with



midtown development parcels (for example, Lafayette Place II and Parcel 30/Keith Block); privatization of certain project elements; and alternative financing arrangements, such as certificates of participation.

# ■ Project Impacts and Mitigation Measures

A Section 61 Finding by an agency must describe all environmental impacts of a project for which an Environmental Impact Report has been prepared, and must make findings that "all feasible measures have been taken to avoid or minimize the impact[s]." (301 CMR 11.10[3]). In addition, the Secretary's Certificate identifies specific areas of concern to be addressed in this Finding. This section of the Finding summarizes the impacts and proposed mitigation for the South Boston Piers Transitway Project. Although the Transitway has been designed to avoid, eliminate, or minimize adverse impacts to the economic, and natural environment, the MBTA has identified through the environmental review process some unavoidable environmental impacts.

In many environmental impact categories, the Transitway has a net beneficial impact. In those categories where an adverse impact is unavoidable, all feasible measures will be taken to minimize the impact. More detail on project impacts and mitigation measures is provided in the FEIS/FEIR. The appendix to this Finding responds specifically to all comments and questions raised by the Secretary and other reviewers of the FEIS/FEIR.

In addition to providing all mitigation measures discussed below and in the FEIS/FEIR, the MBTA will continue to coordinate with public agencies, abutters, and other interested parties on mitigation as engineering for the project is advanced. As described in the FEIS/FEIR, mitigation for sections of the Transitway to be jointly constructed with the CA/T Project will be consistent with mitigation plans approved for the CA/T Project. All mitigation is being fully coordinated between the two projects. More detail on specific issues raised by the Secretary and commenters with regard to such coordination is provided in this section of the Finding.

The MBTA finds that the South Boston Piers Transitway Project will have the following environmental impacts and states that mitigation measures described below will be implemented.

#### Neighborhoods, Land Use, and Economic Activity Mitigation

The MBTA finds that improved transit service supports and is compatible with future development in the South Boston Piers area. The Transitway supports full build-out of the Piers area as envisioned by local and regional planners, and enhances economic growth opportunities, including significant new development and employment. Underground operation will avoid disruption to neighborhood street life and aesthetic character, while improving access to the waterfront and new jobs in the Piers area, and supporting the social cohesion of the developing residential areas.

A number of private and public acquisitions/easements will be required to construct and operate the tunnel and surface and subsurface facilities; title searches and property line surveys will be conducted during later design phases to accurately define the properties and owners affected. In the case of property acquisitions, the MBTA will work with the affected owners and occupants



during design to ensure the provision of adequate relocation assistance as provided by law. By assisting owners/occupants prior to construction, sufficient time is available for relocation, and property is vacated before construction begins. Likewise, owners and occupants subject to property easements will be involved during the development of Transitway design and construction staging plans to identify and mitigate any temporary construction period impacts. Potential mitigation measures include maintenance of pedestrian and vehicular access and replacement or compensation for displaced parking.

Total property acquisitions for construction of the initial build Transitway are approximated at, but not limited to, 37,500 square feet occupied by the Victoria Station restaurant (64 Sleeper Street), 9,980 square feet at 125 Northern Avenue, and property at the maintenance facility site. Acquisitions necessitated by construction of the maintenance facility, which is described in more detail on pages 8 and 9, include the following:

647A East Street (43,023 square feet) 380-386 West First Street (29,451 square feet) 370 West First Street (56,373 square feet) 300 West First Street (211,365 square feet)

Extension of the Transitway to Boylston Station will necessitate minor property acquisitions for construction of Chinatown Station, as follows:

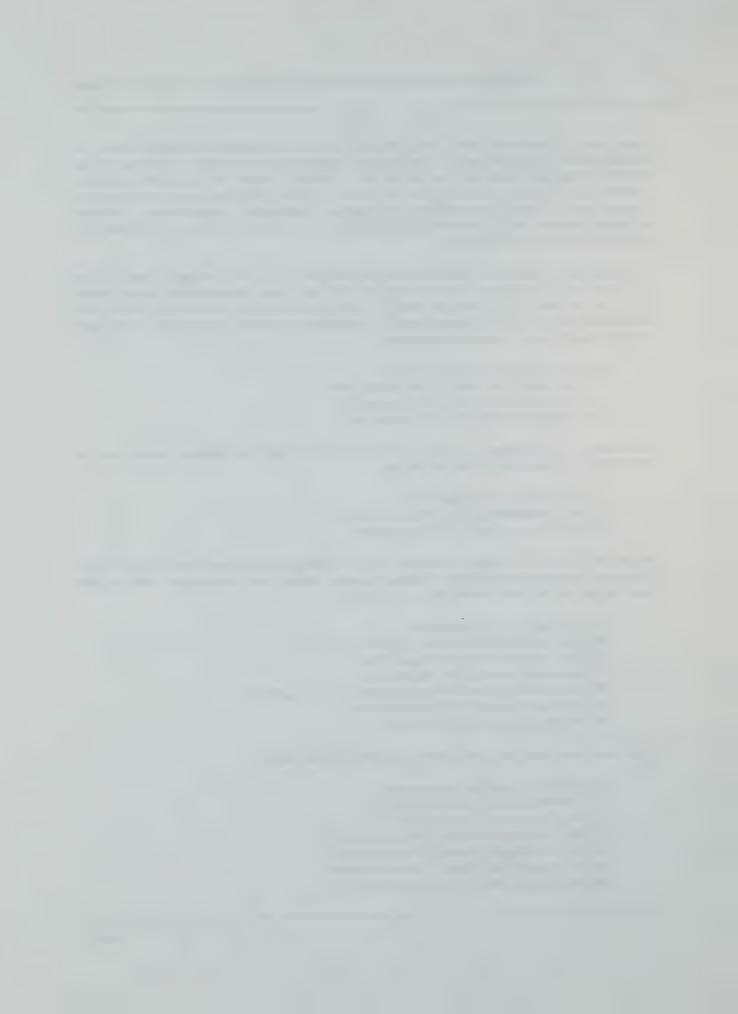
10 Avery Street (490 square feet) 597-611 Washington Street (190 square feet) 580 Washington Street (5,140 square feet)

In addition, a number of property easements will be required for construction and operation of the Transitway's underground facilities, including the tunnel, stations, and passageways. For the initial build Transitway, property easements are as follows:

Russia Wharf (11,000 square feet)
Atlantic Avenue/Boston Edison (13,000 square feet)
125 Northern Avenue ((3,570 square feet)
47 Farnsworth Street (3,960 square feet)
Pittsburgh Street at New Northern Avenue (3,620 square feet)
145 Northern Avenue (21,270 square feet)
149 Northern Avenue (670 square feet)

Easements associated with the full build Transitway are as follows:

174 Tremont Street (380 square feet) 176 Tremont Street (1,550 square feet) 10 Avery Street (4,153 square feet) 597-611 Washington Street (2,720 square feet) 513-515 Washington Street (250 square feet) 617-631 Washington Street (1,030 square feet) 580 Washington Street (11,900 square feet)



89 Chauncy Street (4,540 square feet)
120 Essex Street (1,610 square feet)
Essex Street at Columbia Court (750 square feet)
19 Lincoln Street (290 square feet)
Essex Street at Surface Artery (2,030 square feet)

The Secretary has stated that "[i]f it is determined that the best solution for the project and the Seafood Center involves taking of the building, a suitable alternative site in the Piers area should be found ... and assurance [provided] that there is no involuntary displacement of the industry pursuant to 310 CMR 9.36(5)."

The MBTA will underpin, rather than acquire, the New England Seafood Center. No relocation of existing owners and occupants will be required for this parcel as described above on pages 7-8 ("The New England Seafood Center").

The MBTA finds that temporary construction-related impacts to neighborhoods and economic activity throughout the project area can be mitigated through the maintenance of pedestrian and vehicular access, provision of appropriate signage, and selection of the least disruptive feasible construction methods and staging. Given that the Transitway is intended to foster and support future continued development of the South Boston Piers area and the larger Boston metropolitan region, the MBTA is sensitive to the needs and interests of affected businesses. The MBTA also has substantial construction experience in dense urban areas. As the design of the Transitway progresses, the MBTA will continue to coordinate with affected agencies and abutters to address such issues as construction staging and maintenance of vehicular (including trucks) and pedestrian traffic, and to further develop and implement proposed mitigation measures.

## **Energy Impacts Mitigation**

The MBTA finds that implementation of the Transitway Project will result in overall energy savings. Regional energy impacts of the Transitway will be the result of a reduction in automobile travel, offset only partially by the energy requirements for the project's construction and operation. Since implementation of the Transitway results in estimated energy savings equivalent to 52,400 barrels of crude oil a year, no mitigation measures are planned or considered necessary.

#### **Aesthetic Impacts Mitigation**

The MBTA finds that the project includes adequate measures for the mitigation of aesthetic impacts. Although aesthetic impacts will occur during construction, such impacts will be short-term, lasting only as long as the localized construction activity. Once constructed, the underground Transitway's aesthetic impacts will be limited to relatively few surface system elements, such as headhouses and station entrances, the tunnel portal, ancillary support facilities (including the catenary system), and traction power equipment.

The Secretary has stated that "[t]he design of the catenary system in the eastern section of the project will need to consider the special requirements of the Boston Marine Industrial Park (BMIP). The system must be designed to accommodate the movement of large heavy equipment necessary for the operations at the BMIP. In addition, as the project makes a transition into more residential



areas, the urban design elements should be sensitive to the residential neighborhood."

Design of the catenary system serving the Transitway's surface routes will consider both the special requirements of BMIP as well as the scale and character of the South Boston residential community. Specifically, design specifications for the Transitway catenary system will be established to accommodate the operation of trucks and heavy equipment on surface streets. In addition, the surface catenary system will be coordinated with other streetscape elements under design for the South Boston Piers area. More detail on these design and mitigation efforts is provided on pages 12 and 13 ("Design of the Transitway Catenary System").

## Air Quality Impacts Mitigation

The MBTA finds that the project provides a regional air quality benefit. The Transitway will reduce regional emissions of carbon monoxide (CO), non-methane hydrocarbons (NMHC), and nitrogen oxides (NO<sub>x</sub>), will reduce vehicle miles traveled (VMT) by 311,428 miles a day, and will not produce any incremental or additional violations of the CO standards. These air quality benefits are associated with the operation of electric trackless trolley vehicles and with the diversion of automobile trips to transit. Given these air quality benefits, no mitigation is considered necessary.

Any air quality impacts during construction will be localized and temporary. Traffic mitigation measures to be employed will be designed to keep traffic flowing in and around construction sites, thereby minimizing idling and congestion which contribute to localized air quality impacts.

# **Noise and Vibration Impacts Mitigation**

The MBTA finds that the project includes adequate measures to mitigate noise impacts, both during construction and once the Transitway is operational. Although the FEIS/FEIR contained estimates of construction noise levels associated with specific construction phases, such as clearing, excavation, foundation, erection, and finishing, more detailed noise levels during construction will need to be quantified once construction methods, equipment, and staging are determined for each design section. Once these noise levels and impacts are identified, mitigation measures that could be implemented to reduce noise levels associated with construction of the Transitway include the following:

- Restricting noise-generating construction activities in the vicinity of residential areas before 7:00 a.m. and after 6:00 p.m.
- Ensuring that all diesel powered equipment is properly muffled (faulty or ineffective mufflers are major sources of construction noise).
- Providing specific routes for truck movements to and from construction sites to avoid streets with sensitive receptors.

Although the MBTA is not bound by local ordinances, the Authority will also consider the City of Boston Air Pollution Control Commission's (APCC) construction noise ordinances when developing construction noise mitigation.

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In addition, the MBTA is in the process of developing a new noise policy aimed at directing the Authority's approach to identifying and mitigating noise problems. This policy will replace the reactive, situation-by-situation approach previously used by the MBTA to respond to complaints about noise related to the delivery or construction of transit services. Highlights of the policy which will govern construction noise as well as the monitoring of operational noise associated with the Transitway include the following:

- A noise consultant will be hired to establish MBTA systemwide preliminary criteria and standards which are compatible with existing state and federal regulations and industry standards.
- Up to 2 percent of the construction budget will be dedicated to noise mitigation for new construction projects.
- For each project, a survey will be conducted to identify and assess operational and construction noise concerns in accordance with the criteria.
- The consultant will rank problem areas based on severity, recommend a range of mitigation remedies, and estimate the costs associated with potential mitigation remedies.
- Recommended remedies will be proposed to the General Manager by MBTA project staff.

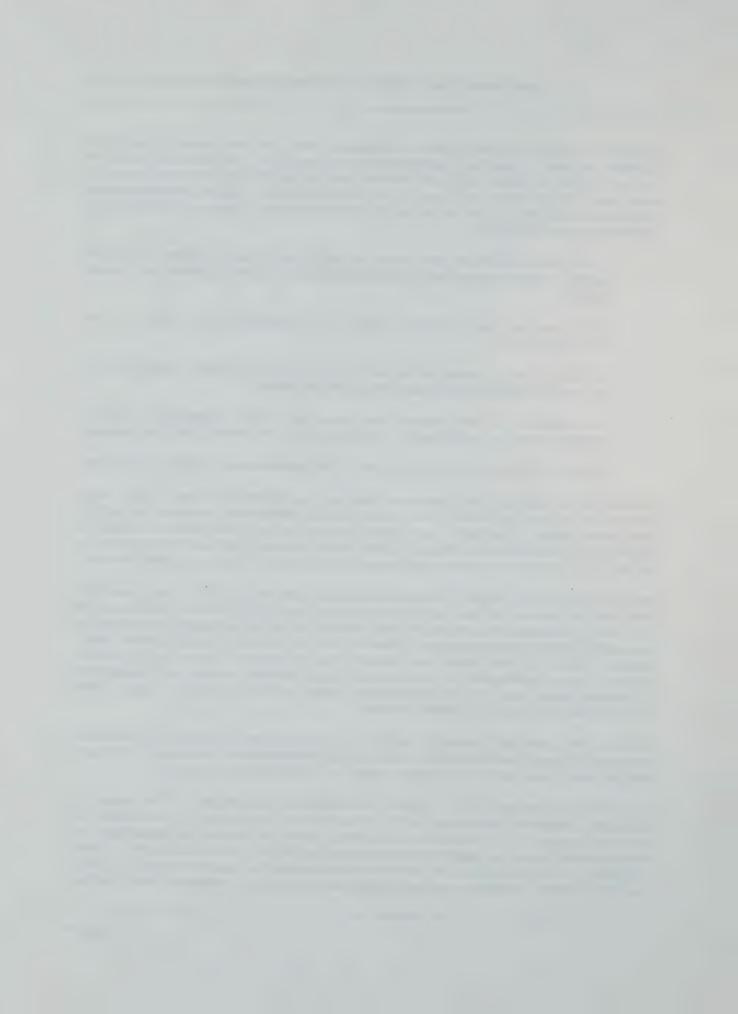
Operational noise impacts of the Transitway Project are expected to be minimal. This is due to the fact that the Transitway involves the operation of rubber-tired vehicles in a tunnel that extends from South Station to the World Trade Center in the initial build configuration; the tunnel is extended from South Station to Boylston Station in the Transitway's full build configuration. In addition, only twelve sensitive noise receptors are located along the Transitway full build alignment.

Noise analysis of both Transitway segments was conducted for the FEIS/FEIR in accordance with the FTA's draft noise impact assessment procedures and noise impact criteria (FTA, 1990). In the initial build Transitway, this analysis showed that five of the twelve receiver sites along the alignment would be severely impacted. These sites are the St. James Roman Catholic Church, Chauncy House, Tai Tung Village, the Children's Museum, and the Sleeper Street residential buildings. This number decreases to three in the full build Transitway when the tunnel is extended to Boylston Station, and only Tai Tung Village, Children's Museum, and the Sleeper Street residential buildings would be severely impacted.

The Secretary states that "[t]he MBTA and the Boston Environment Department should meet to determine if the agencies can develop mutually acceptable noise criteria...and report on the results and also clarify how noise will be monitored when the Transitway is operational."

The MBTA has met with BED to discuss the Department's objections to FTA's criteria for acceptable operational noise levels, which BED believes are too stringent for urban areas. As discussed on page 21 ("Operational Noise Criteria"), the MBTA believes that operational noise impacts of the Transitway, which involves underground operation of rubber-tired vehicles, will be negligible. To ensure that any operational noise is maintained at acceptable levels, the MBTA commits to monitor Transitway noise in accordance with the Authority's new noise policy described

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above. A noise monitoring program will be implemented, and Transitway operational noise will be monitored on a regular basis.

The MBTA also finds that the project includes adequate measures to mitigate vibration impacts both during construction and operation of the Transitway. Ground vibration from construction activity is not expected to exceed the criterion limit for structural damage of 2.0 inches per second peak velocity (National Academy of Sciences, Committee on Hearing, Bioacoustics, and Biomechanics) at any building or structure along the proposed alignment of the initial build Transitway. Widespread pile driving for structure foundation is not anticipated during construction; however, steel sheet piling is being considered as a cost-effective method for providing lateral support of cut-and-cover sections in the South Boston Piers area. In addition, mitigation may be required to avoid potential architectural damage at historic buildings adjacent to the slurry wall construction, particularly along Tremont and Avery Streets as part of the Transitway full build segment. Mitigation for this potential impact will be provided through the addition to the project design team of an architectural firm experienced in historic preservation (see pages 31 through 33, "Historic and Archaeological Resources").

Operation of the Transitway is not expected to result in any adverse vibration impacts. Transitway tunnel floors will be maintained in smooth condition to ensure that groundborne vibration and noise generated by the underground Transitway trackless trolley operations will be minimal. Minor low frequency vibrations due to supplemental surface bus operations would not be of sufficient magnitude to exceed either annoyance criteria or structural damage criteria.

# **Ecosystems Impacts Mitigation**

The MBTA finds that the project includes adequate measures to mitigate expected impacts to area ecosystems. Potential short-term environmental impacts of the project include temporary disturbances to the floodplain, channel banks, and wildlife use of the channel during tunnel construction. These impacts are expected to be minor, and none will extend beyond the construction period. Work within and adjacent to the Fort Point Channel and filled tidelands will require state permits, licenses, and/or approvals pursuant to the Massachusetts Wetlands Protection Act, Chapter 91, MCZM, and federal permits pursuant to the Clean Water Act and the Rivers and Harbors Act.

The MBTA will comply with Chapter 91 and MCZM as they relate to use and protection of the waterfront and coastal zone. The Transitway Project itself furthers the goals underlying these laws. Specifically, by establishing an important link between downtown Boston and the South Boston Piers area, the Transitway improves public access along the waterfront and passive recreation at or near the water's edge. As such, the project facilitates access to the Boston Harbor waterfront while supporting the continued maritime use of the area. Mitigation measures relating to public access and use of the waterfront which will be considered during the licensing process will include the reestablishment/construction of public walkways along the Fort Point Channel, the exploration of similar opportunities along the Reserved Channel at Pappas Way near the maintenance facility, and station design components to emphasize waterfront themes and facilitate pedestrian waterfront access.

While construction activities will not cause significant displacement of existing rodent populations,



some localized rodent disturbance is likely. The degree of such disturbance will be related to the amount of habitat disruption either through tunnel excavation activities, demolition of existing structures, or the excavation of new foundations. A rodent control program as outlined in the MBTA's Standard Specifications (1991) will be implemented to mitigate these effects.

# **Water Resources Mitigation**

The MBTA finds that the project includes adequate measures for the mitigation of impacts to water resources. Potential temporary short-term impacts to the water resources of the Fort Point Channel as a result of construction of the Transitway will include resuspension of bottom sediments, constriction of channel flow, and decreased navigability. Since the Transitway tunnel section within the Fort Point Channel will ultimately lie beneath the bottom of the channel floor, no long-term or permanent changes to the existing physical or hydrological characteristics of the channel are anticipated.

The Secretary has stated that "the construction methodology for work in the Fort Point Channel has not been selected. The comments received on the FEIR/EIS offer many details regarding preferred methods. Consultation with the Massachusetts Coastal Zone Management (MCZM) office and DEP is recommended."

The MBTA has met with the USACOE, MCZM, DEP, and the Conservation Law Foundation to discuss the Fort Point Channel crossing construction methods. Based on these meetings and analysis of both the immersed tube and cofferdam methods, the MBTA has selected the semiconfined concrete immersed tube construction method over the cofferdam as the preferred alternative for the crossing of the Fort Point Channel. This method minimizes total construction duration, in-water construction duration, and costs, and enhances the ability to successfully mitigate environmental impacts. Specifically, the semi-confined concrete immersed tube can be constructed 11 to 13 months faster than the cofferdam; has a 30-week, versus a 68-week, in-water construction period; is estimated to cost \$3.5 million dollars less than the cofferdam method; and can be constructed in an environmentally sound manner.

As described above on pages 18 through 20 ("Fort Point Channel Crossing Method"), the immersed tube construction method will be implemented in a manner that minimizes potential impacts. Specifically, the most significant potential impact of the preferred immersed tube channel crossing method — increased levels of suspended solids on water quality during dredging — can be successfully mitigated through the use of silt curtains, modified dredging techniques, and continual water quality monitoring. The MCZM consistency review and the USACOE permit applications (Section 401 and 404) will detail this and other mitigation measures.

Some dewatering of the Transitway excavations will be required during construction. Steps will be taken to limit drawdown of the existing groundwater table outside of the project alignment, and to reduce the amount of groundwater discharged to surface waters. Based on anticipated dewatering rates, no groundwater injection is anticipated.

Discharge of pumped groundwater and stormwater to local storm drains will be subject to National Pollution Discharge Elimination System (NPDES) permit review by the U.S. Environmental Protection Agency and the Massachusetts DEP, a dewatering permit from the Boston Water and



Sewer Commission (BWSC, Article 11, Section 8 of the Commission's Sewer Use Regulations), and a Massachusetts Water Resources Authority Industrial Sewer Discharge Permit for washing and maintenance of the tunnel. These permitting processes will establish control measures necessary to prevent water quality impacts to the downstreaming waters. The storage and maintenance facility will be subject to construction and post-construction NPDES permits. Tunnel discharge via a sump at the low point beneath the Fort Point Channel will also require a post-construction NPDES permit.

Normal site stormwater accumulation will occur in excavations that are open to the sky. These areas are generally limited to areas east of the Fort Point Channel. At other areas of operations, including the storage/maintenance facility, oil and water separators will be installed in lines draining runoff from the site to storm sewers, in accordance with BWSC standards.

# Groundwater Pressure Relief System Included in the C11A1 Construction Contract

The Transitway station at South Station will include a groundwater pressure relief system to mitigate structural impacts from removing the existing overburden and alterations to the existing structure. Since the need for this system and its subsequent design was identified after the project's FEIS/FEIR was approved, this Finding describes the subsurface conditions in the South Station area, potential impacts of the system, and mitigation of anticipated impacts. In general, the impacts of the system are expected to be minimal and localized.

The subsurface profile in the general area around South Station consists of the following strata:

- Fill and organics/clay (at some locations)
- Cohesive glacial till (T<sub>1</sub> and T<sub>2</sub>)
- Granular glacial till (T<sub>3</sub>)
- Bedrock

Detailed subsurface profiles showing the foundations of the MBTA Red Line station and adjacent structures are presented in the CA/T Project's Design Section DO11A geotechnical engineering report.

Two groundwater aquifers are present at the site: an upper aquifer in the fill/organics stratum, and a lower aquifer in the granular till  $(T_3)$ /bedrock strata. The two aquifers are separated by the cohesive glacial till  $(T_1$  and  $T_2)$ , which has a low permeability. Piezometer measurements indicate that the piezometric level in the lower aquifer is approximately 13 feet lower than the level in the upper aquifer.

Since the proposed groundwater pressure relief is isolated within the cohesive till strata, it is not expected to cause significant drawdown in either aquifer. A finite element seepage analysis was performed to evaluate potential drawdown in the granular till  $(T_3)$ , which is the closest aquifer to the pressure relief system. The analysis indicates that the depressurization will be confined mainly within the cohesive till below the station. The computed reduction in piezometric head is less than 4 feet at a distance of 50 feet from the relief wells, and less than 2 feet at a distance of 100 feet.

The depressurization is confined to a very limited area, and impacts to the adjacent buildings



(Federal Reserve Bank, One Financial Center, South Station Headhouse) are expected to be negligible. Unanticipated conditions, such as hydraulic connection to the upper aquifer, could cause the depressurization to extend to the adjacent buildings. Resulting settlement impacts are expected to be negligible in any event since the adjacent buildings are founded on the extremely dense glacial till strata, which have very low compressibility. However, the timber piles supporting the South Station Headhouse could be adversely impacted (i.e., exposed to decay) by unanticipated drawdown of the upper aquifer. Although the pressure relief system is designed to be isolated from the upper aquifer, the potential exists for a connection between the system and the upper aguifer to be created inadvertently during construction. To mitigate this risk, the system has been designed with isolation valves at every relief well so that the concentrated flow from such a connection can be located and sealed by grouting. In addition, groundwater levels in the upper aguifer will be monitored as part of the geotechnical instrumentation program for the Transitway Project; monitoring of groundwater levels will also be conducted for a period following the completion of construction. System flows, estimated to be 5 to 10 gallons per minute, will be monitored for the life of the system. Connection to either aquifer should be easily recognized by a measurable increase in flow.

The groundwater pressure relief system is incorporated within the CA/T Project's C11A1 construction contract. As described in the Interagency Agreement for the C11A1 contract between the MBTA and MHD, the MBTA will be responsible for mitigating all potential impacts of the system.

# Sediment Excavation, Reuse, and Disposal

The MBTA finds that there is sufficient capacity in existing disposal facilities to dispose of project excavate. Implementation of the full build Transitway is estimated to generate 637,500 cubic yards of excavate material, 396,490 cubic yards of which are anticipated to be generated over a five-year period from 1995 through 1999, while the remaining 241,010 cubic yards will be generated in the years 2003 through 2005. Of this volume of material, only 172,200 cubic yards will likely need to be disposed of in solid waste landfills. The remaining portion will be utilized as project backfill (132,700 cubic yards), landfill cover material (114,000 cubic yards), landfill lining or capping material (183,600 cubic yards), or disposed of in ocean waters (35,000 cubic yards).

DEP preliminary estimates of cover and closure material demand for unlined landfills in Massachusetts indicates a demand capacity exceeding that generated by both the CA/T Project and the Transitway Project. These estimates do not include the demand generated by the state's lined landfills. A survey of lined landfills within a 25-mile radius of Boston conducted for the transit project's FEIS/FEIR indicates demand capacity for the Transitway Project material. Furthermore, the DEIR/S for the Boston Harbor Navigation Improvement and Berth Dredging Project has indicated that the preferred location for disposal of harbor improvements dredge material is at a number of ocean disposal sites. Assuming that its preferred alternative will be initiated, the harbor dredging project would not be in competition with the Transitway and CA/T Projects for landfill space.

Given the demand for cover and closure material, competition for landfill space will likely be associated only with those materials that cannot be utilized and must be disposed of as a solid waste. For the Transitway Project, this is limited to approximately 172,200 cubic yards of



miscellaneous fill, contaminated fill, and ocean mucks, the generation of which will occur over an eight-year period.

The Secretary has stated that "the disposal of excavated material should be coordinated with the Central Artery/Tunnel Project."

As described above on page 20 ("Coordination with CA/T Project on Disposal of Excavated Material"), the MBTA has coordinated with the CA/T Project in assessing the disposal opportunities for Transitway excavate material, and with respect to shared excavate handling and disposal efforts. As a result of this coordination, it has been agreed that Transitway excavated materials generated during work on the joint construction section (C11A1, "I-93 Northbound Tunnel Atlantic Ave.") will be handled and disposed of in accordance with the MOU between the CA/T Project and DEP.

Opportunities for continued coordination of excavate material from the two projects beyond the C11A1 contract are the subject of ongoing discussion between the MBTA and CA/T Project; these opportunities will continue to be explored during the final design and permitting phases of the Transitway Project. Communications with DEP are also being initiated to determine the degree to which the MBTA can participate in the MOU between the CA/T Project and DEP, thereby allowing the co-mixing of both projects' excavate. Procedures and facilities for the handling and disposal of excavate materials that will be established for the Transitway Project during its final design and permitting phases will reflect the results of this ongoing coordination with the CA/T Project and DEP.

# Historic and Archaeological Resources

The MBTA finds that the project includes adequate measures to mitigate impacts to historic and archaeological resources. Impacts of the project have been reviewed with the Massachusetts Historical Commission (MHC) in its capacity as the State Historic Preservation Office (SHPO).

The only significant impact of the initial build Transitway to historic resources in the Piers area will be the temporary removal of 80 linear feet of the granite bulkhead walls on either side of the Fort Point Channel at the tunnel crossing points. These walls will be rebuilt after construction (except within the confines of the tunnel). Steps will also be taken to avoid any settlement impacts of cut-and-cover tunnel construction on the buildings of Sleeper, Farnsworth, Pittsburgh, and Stillings Streets.

Although the Transitway tunnel segment between South Station and Congress Street will be constructed jointly with the northbound Central Artery as part of the C11A1 contract, protection of the historic resources along Atlantic Avenue, the Hotel Essex, and 705-713 Atlantic Avenue is the responsibility of the CA/T Project, under the surveillance of the Project Conservator. The Russia Wharf Buildings will be underpinned to permit construction of the Transitway tunnel below. The construction of new structural supports for this building will help preserve it for the future.

The extension of the initial build Transitway tunnel from South Station to Boylston Station in the project's full build configuration will have impacts on historic resources in the downtown portion of the service area. For example, buildings on Essex, Kingston, Chauncy, and Avery Streets,



Hayward Place and Avenue De Lafayette, are in a zone of potential settlement as a result of deep bore tunnel construction. In addition, the tunnel is proposed to be located under a portion of the Textile Building, 89-99 Chauncy Street.

The process of deep tunneling through soil should not cause any significant vibration impacts, but tunneling could cause buildings to settle if proper techniques are not implemented. Dewatering of the excavation could also lead to settlement. To mitigate any potential settlement impacts, the protection of these historic buildings must be a continuing process throughout the design and construction phases. The steps in this process are: identification of historic resources (a process already completed); documentation of the buildings' structure and condition; inspection of the buildings; geotechnical survey; engineering design of tunnel structure for areas close to historic structures; incorporation into construction specifications of standards for vibration, pile driving, structure underpinning and bracing, and soil and groundwater monitoring; movement monitoring during construction; and documentation after completion of construction.

The Transitway's Boylston Station and accompanying turnback loop will be built a full level below the existing Green Line station (a National Historic Landmark) by a combination of cut-and-cover construction below Tremont Street and mining (excavation) below the Green Line station and under the Boston Common (a National Historic Landmark). Impacts to the interior of the existing Boylston Station will be limited to temporary caisson casings to underpin the existing Green Line Station and permanent openings for stairways extending from the Green Line platforms down to the Transitway Station level. Any impacts to Boylston Station and the adjacent Tremont Street subway will conform to the Secretary of the Interior's Standard for Rehabilitation of Historic Structures. The Boylston Station interior is considered to be historically significant since it has been the least altered of the original Tremont Street subway stations.

A Memorandum of Agreement (MOA) has been prepared between the FTA, MHC, and Advisory Council on Historic Preservation, with concurrence by the MBTA and the Boston Landmarks Commission (BLC). This agreement establishes measures intended to avoid, minimize, and/or mitigate impacts to historic and archaeological resources, including the following measures:

- Prior to alteration of any significant properties, a historic survey will be conducted to document the pre-alteration condition of the property.
- A Project Conservator shall be included on the project design team by the MBTA to ensure that adverse construction impacts to all historic properties are identified early in the project design stages, and are either avoided, minimized, or mitigated through appropriate preliminary and final design solutions.
- An architectural firm with experience with historic preservation shall be included on the
  project design team by the MBTA to assist in the design of building elements associated
  with the project that affect historic resources.
- The granite bulkhead walls on either side of the Fort Point Channel at the Transitway tunnel crossing points shall be reconstructed in such a manner as to ensure that the existing appearance and function of the bulkheads are maintained.



- The interior of Boylston Station shall be rehabilitated following construction of the project in conformance with the Secretary of the Interior's Standards for Rehabilitation of Historic Structures.
- Further intensive archaeological investigations shall be undertaken prior to construction in the vicinity of Boylston Station and the Central Burying Ground.

# **Parklands Impacts Mitigation**

The MBTA finds that the project includes adequate measures to mitigate impacts to parklands. In the initial build Transitway, these impacts may include temporary, construction-related disruption to pedestrian and vehicular access to the waterfront. Construction of the full build Transitway segment will have an impact on Lafayette Mall at the southeastern corner of Boston Common. No permanent adverse impacts to parklands are anticipated as the result of operation of either the initial build or full build Transitway. Rather, the provision of high quality transit service will improve access to the limited parklands in the project area, including Harborwalk.

The MBTA will mitigate any impacts to parklands during construction of both segments of the Transitway. In the initial build Transitway, vehicular access to the waterfront will be maintained although some detours and reroutings will occur. While these detours and reroutings will be identified as construction staging plans are developed, the MBTA will work closely with the BTD to ensure that safe, efficient vehicular and pedestrian access to the waterfront is provided throughout the construction period.

During construction of the full build Transitway, pedestrian access to Lafayette Mall will be ensured as the design and construction program for new Transitway platforms at Boylston Station are further developed. In developing the construction program, the MBTA will work closely with the Boston Parks and Recreation Department (BPRD) as well as BTD. All construction work and staging areas will be fenced off, and the diversion of one lane of traffic onto Lafayette Mall, which is necessitated by construction of the station slurry walls along Tremont Street, will be accomplished and monitored in close coordination with BTD. Restoration of Lafayette Mall will be consistent with BPRD's Boston Common Management Plan.

Minor disruption to the Common will also occur during construction of dewatering wells needed to allow construction of the slurry walls from within the existing Boylston Station. The MBTA will work closely with the BPRD and the BLC as the design of the Transitway progresses to establish a means of minimizing visual intrusion and to ensure that there is no permanent damage to the Common.

The exact amount of affected parkland at the Boston Common will be determined once design of the full build Transitway is finalized; this design is scheduled to begin in the year 2000. Because the new Transitway station will be constructed one level beneath the existing Boylston Station, construction will occur at a very deep level — approximately 40 feet underground — and will be hand mined. Given this deep construction and the use of proposed groundwater control methods (e.g., slurry walls for station and grouting ahead of the tunnel face for the adjacent turnaround), groundwater levels should not be lowered significantly. As a consequence, the root systems of the few trees in the construction area would not be damaged.



# **Traffic Impacts Mitigation**

The MBTA finds that the project has adequate procedures for ensuring mitigation of traffic impacts For all areas of construction traveled by the public, detailed traffic during construction. maintenance plans will be developed and implemented by the MBTA's designers and construction contractors. All plans and measures to be adopted will be the result of ongoing coordination with the BTD and other city and state agencies having jurisdiction, as well as with abutting property owners and businesses. In areas of joint construction with the CA/T Project, mitigation measures will be consistent with maintenance of traffic plans approved for that project. All provisions for access will comply with applicable regulations relative to persons with disabilities, including Americans with Disabilities Act guidelines.

With the exception of joint construction sections with the CA/T Project, maintenance of traffic plans for Transitway construction will be developed during final design of each construction section. Especially where cut-and-cover construction techniques will require open excavations along vehicle and pedestrian corridors, construction plans and specifications will be developed which detail measures to be adopted to mitigate impacts to vehicular and pedestrian traffic. Such measures will include as a minimum:

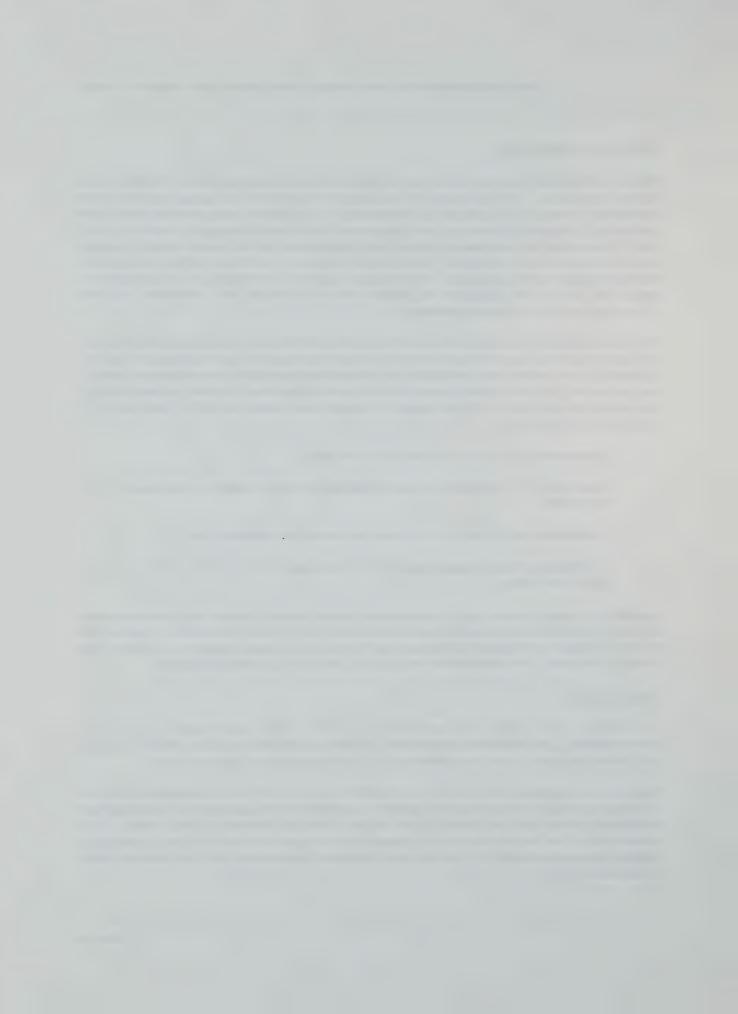
- Coordination with other public and private projects;
- Requirements for notification of upcoming construction activities which impact abutters and commuters;
- Coordination with city agencies affected by construction activities; and
- Pre-notification and signage associated with detouring of vehicles and pedestrians around construction sites.

Coordination among various public agencies and private property owners and businesses with respect to two areas of construction — Dewey Square and the D Street corridor — has resulted in more detailed information on mitigation of construction-related impacts to vehicular and pedestrian impacts. This coordination and resulting mitigation is summarized below.

### **Dewey Square**

The Secretary has stated that the MBTA and MHD "should work together to improve communication ... and mitigation commitments [should be] based on shared data and joint analysis, and should be responsive to the comments of ... the Atlantic Avenue Abutters Group."

Rigorous and ongoing coordination between the MBTA and the CA/T Project has yielded numerous benefits, most notably an agreement by the MBTA and MHD to jointly construct the Transitway and northbound Central Artery in Dewey Square as part of the CA/T Project's C11A1 contract. Joint construction of the two projects affords considerable cost savings to the state and substantially reduces the environmental impacts that would otherwise be associated with two separate major construction projects.



A comprehensive coordination process developed by the CA/T Project and MBTA has involved the Atlantic Avenue Abutters Group in the development of a construction mitigation plan for the Dewey Square/South Station area. Coordination with the Abutters Group on the mitigation plan also satisfies requirements of the MBTA's Phase I waiver which permits accelerated coordinated construction of the Transitway and northbound Central Artery as part of the C11A1 contract.

Throughout planning and design of the CA/T and Transitway Projects, the MHD and MBTA have shared data, jointly analyzed project impacts, and coordinated mitigation plans. Such coordination efforts and resulting mitigation agreements, which are described in more detail on pages 16 and 17 ("Coordination with CA/T Project"), will continue as both projects advance into construction.

# D Street Corridor Traffic

The Secretary has recommended that "[t]he MBTA meet with representatives of the Massachusetts Highway Department (MHD), Massport and BTD to explore alternative circulation patterns at [the D Street/Massport Haul Road] location." The Secretary also states that "mitigation commitments ... should be responsive to the comments of the [Boston Shipping Association]" and that "conflicts between bus operations and truck operations at key intersections may require further mitigation."

As described in greater detail on pages 13 and 14 ("D Street Corridor and Massport Haul Road/D Street"), the MBTA has participated in a public process established by the CA/T Project to address traffic circulation in the Piers area and truck access to the DPA. Other participants in this process include Massport, DEP, BTD, BRA, EDIC, BSA, and The Boston Harbor Association. This process has resulted in the preparation of a *South Boston Truck Access and Circulation Study* (April 1994). Mitigation recommended in that study includes grade separation of D Street and the Massport Haul Road, and connection of Summer Street and the Massport Haul Road by a new "Pumphouse Connector Road" opposite E Street.

In June 1994, the CA/T Project initiated an amended truck study based on a traffic network that includes project design refinements that will be described in a forthcoming NPC. The two proposed mitigation measures for the D Street corridor (grade separation of D Street and Massport Haul Road and construction of the Pumphouse Connector Road) are also included in the amended study. As with the April 1994 truck study, the traffic networks showing traffic volumes in the amended truck study area include the Transitway operations. Through its participation in the development of this study, the MBTA will ensure that Transitway construction impacts and operations are fully addressed, and any combined impacts and operations are mitigated in a coordinated and effective manner. Thus, BSA and BTD concerns will be addressed through this process.

The Transitway has been designed with the goal of reducing total passenger vehicle traffic in the South Boston Piers area. This goal is served by attracting riders to high occupancy vehicles and by placing these vehicles in a tunnel in the most congested parts of the area. Surface operation of the Transitway vehicles and supplemental buses in the eastern portion of the Piers area is also designed to avoid conflicts with truck operations in this area. Achievement of these goals is evidenced by a significant reduction in surface congestion resulting from Transitway implementation as compared to the no action scenario. The MBTA has shown that without the Transitway, three intersections in the project area operate at LOS E, and another three operate at LOS F. In



contrast, the Transitway significantly reduces traffic congestion. Thus, the Transitway clearly has a beneficial impact on surface congestion in the South Boston Piers area and the DPA.

The MBTA will continue to work with the BSA, BTD, and CA/T Project as plans for Transitway implementation are advanced to ensure that any potential conflicts between Transitway surface operations and trucks are minimized and appropriately mitigated.



## **FINDING**

The Massachusetts Bay Transportation Authority hereby finds that the foregoing describes the environmental impacts of the project and that, with implementation of the mitigation measures described above, all feasible means and measures will have been taken to avoid or minimize adverse impacts to the environment relating to the South Boston Piers Transitway Project.

Approved as to Form

Peter B. Morin General Counsel

Even

Date

MASSACHUSETTS BAY TRANSPORTATION AUTHORITY

John J. Haley, Jr. General Manager

Date



**APPENDIX** 



#### Note:

Two comment letters were received which did not ask questions or raise issues requiring specific responses. The MBTA appreciates their support for the project, and the respondents will remain on the mailing list for future submittals relating to this project. The comments were submitted by The Boston Society of Architects, and Peabody & Arnold on behalf of the Boston Wharf Company. Copies of their letters are included at the back of the Appendix.





# The Commonwealth of Massachusetts Executive Office of Environmental Affairs 100 Cambridge Street, Boston, 02202

WILLIAM F. WELD
GOVERNOR

ARGEO PAUL CELLUCCI
LIEUTENANT GOVERNOR

TRUDY COXE

SECRETARY

February 16, 1994

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# CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS ON THE FINAL ENVIRONMENTAL IMPACT REPORT/ ENVIRONMENTAL IMPACT STATEMENT

PROJECT NAME

: South Boston Piers/Fort Point Channel

Transit Project

PROJECT LOCATION
EOEA NUMBER
PROJECT PROPONENT

: Boston : 6826

: MBTA

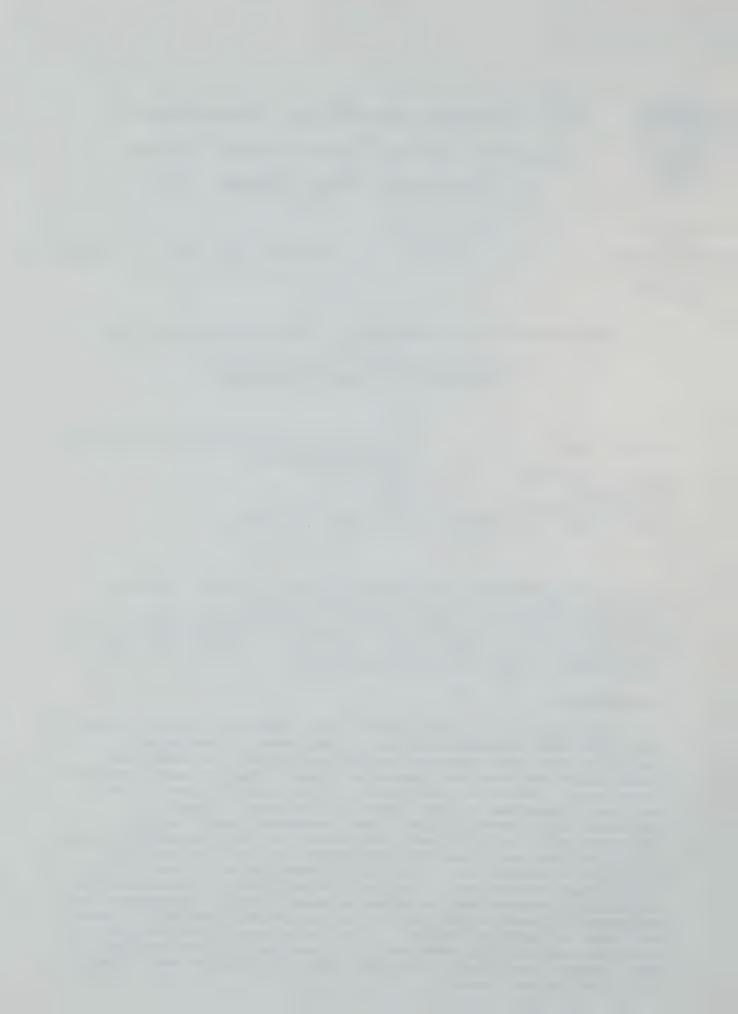
DATE NOTICED IN MONITOR

: December 22, 1993

The Secretary of Environmental Affairs herein issues a statement that the Final Environmental Impact Report/Environmental Impact Statement submitted on the above project adequately and properly complies with the Massachusetts Environmental Policy Act (G. L., c. 30, s. 61-62H) and with its implementing regulations (301 CMR 11.00).

#### Introduction

The South Boston Piers/Fort Point Channel Transit Project is part of a comprehensive effort to implement a series of transportation and regional development goals, as well as specific objectives for improving transportation services to the Piers area. Based on both public input and the results of analysis presented in the Draft Environmental Impact Statement/Supplemental Draft Environmental Impact Report (DEIS/SDEIR), the MBTA has designated the Full Build Transitway utilizing the trackless trolley technology as the locally preferred alternative. A 1.5 mile underground transit tunnel from Boylston Station to the World Trade Center, combined with surface bus operations on streets where traffic congestion is projected to be minimal, will link the Piers area with transit services in downtown Boston. Five underground stations and numerous surface bus stations will provide connections to the Red, Orange, and Green Lines, as well as commuter and intercity rail and bus services.



A variety of changes to the Transitway alignment have been analyzed and incorporated into the Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS). The changes include the following:

- o The Transitway tunnel turns eastward from Atlantic Avenue at Congress Street, rather than at the Central Artery/Tunnel (CA/T) Project's vent building no. 3 in the vicinity of New Northern Avenue. This revised alignment requires the underpinning of the Russia Wharf Buildings and eliminates permanent impacts to Fort Point Channel.
- o The Transitway tunnel and Courthouse Station are now located fully beneath the right-of-way limits of New Northern Avenue. This alignment avoids impacts to developable parcels.
- o The turnaround loop at Boylston Street Station has been extended west beneath Boylston Street; in the DEIS/DSEIR it was assumed that the loop would be below the station. The MBTA has proposed construction techniques that would avoid impacts to the Central Burying Ground and other historic resources in the area of Boylston Station and Boston Common.

The FEIR/EIR identifies two key decisions that must yet be made prior to implementation of the project. The first decision involves whether to take or to underpin the New England Seafood Center. The second decision involves the selection of a site for the Transitway storage and maintenance facility.

#### Need For Additional Information

As the design of this project has progressed, more information on the potential impacts has become available. With this additional information, however, there is heightened concern regarding the impacts and the necessary mitigation. I received many thoughtful comments on the FEIR/EIS. Generally, these comments were supportive of the project, but expressed a variety of concerns that merit additional consideration and resolution by the MBTA prior to implementation of the project. The comments can be broadly divided into three categories: project wide planning and environmental issues, short and long term site specific issues, and construction and operations mitigation issues.

Although most of the major issues are nearing resolution, it is clear that certain aspects of the project are still evolving. Accordingly, I believe that the agencies and the public can



benefit from a review of the MBTA's Draft Section 61 Findings for the Transitway. I therefore require that the MBTA file a Draft Section 61 Finding with MEPA, and circulate it to all agencies involved in the review or permitting of the project and to those who commented on the FEIR/EIS. I will notice the Draft Section 61 Finding in the Environmental Monitor for a 30 day public comment period for receipt of commentary that will be considered in the Final Section 61 Finding.

This Certificate will highlight the major issues that should be addressed in the Draft Section 61 Finding. The comments received on the FEIR/EIS provide detailed guidance pertaining to most of the issues highlighted below. Consultation with the agencies and commenters is recommenced.

# Chapter 91 Issues

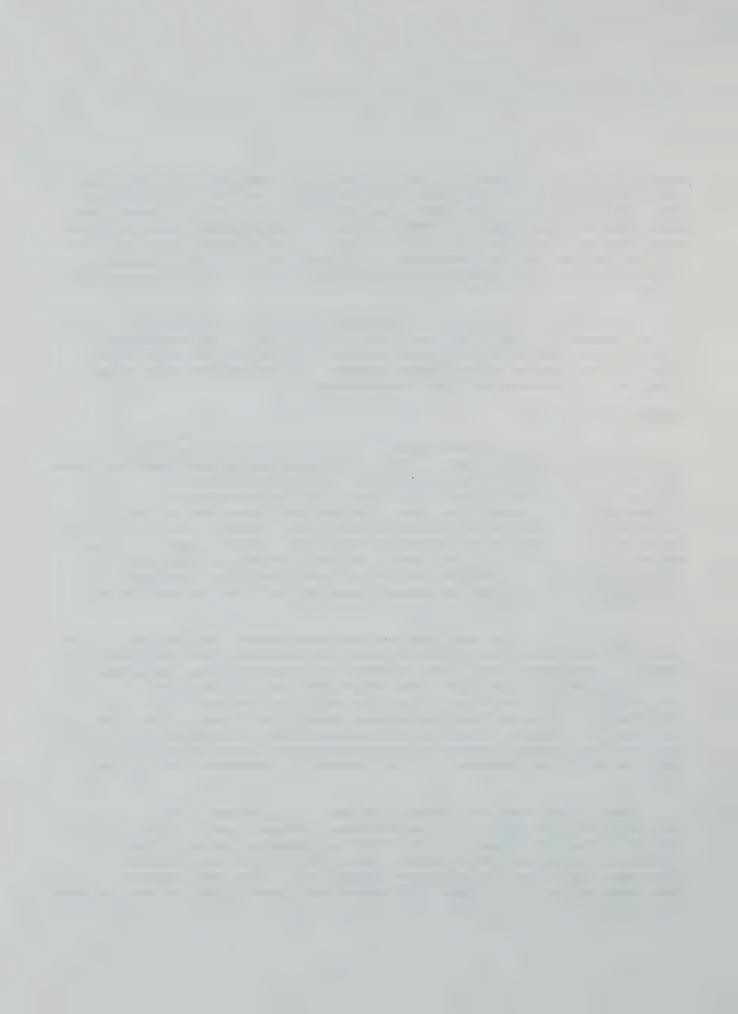
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The FEIR/EIS acknowledges that there are two major decisions remaining for the project. Both of these decisions involve lands subject to Chapter 91 jurisdiction. The Department of Environmental Protection (DEP) indicated in its comments that it agrees with the assertion that the project consists of an infrastructure crossing (under Fort Point Channel) that is water dependent, and an infrastructure facility (Transitway) with an accessory use facility (storage and maintenance) that are nonwater dependent. The DEP has determined that the project consists of a nonwater dependent use subject to the regulatory standards of 310 CMR 9.01-9.40 and 9.55.

The fate of the New England Seafood Center is unclear. FEIR/EIS examined two alternatives: whether to take the Seafood Center by eminent domain or whether to underpin the building. If it is determined that the best solution for the project and the Seafood Center involves taking the building, a suitable alternative site in the Piers area should be found. The Draft Section 61 Finding should provide additional information on this decision and should provide assurance that there is no involuntary displacement of the industry, pursuant to 310 CMR 9.36(5).

Two sites were evaluated for use as a storage and maintenance facility: a site on Summer Street and a site on First Street. Summer Street is the MBTA's preferred site. preferred site currently has a water dependent use whereas the proposed use would be nonwater dependent. The MBTA should continue to work with the DEP regarding the siting issues related to Chapter 91. The Draft Section 61 Finding should report on the



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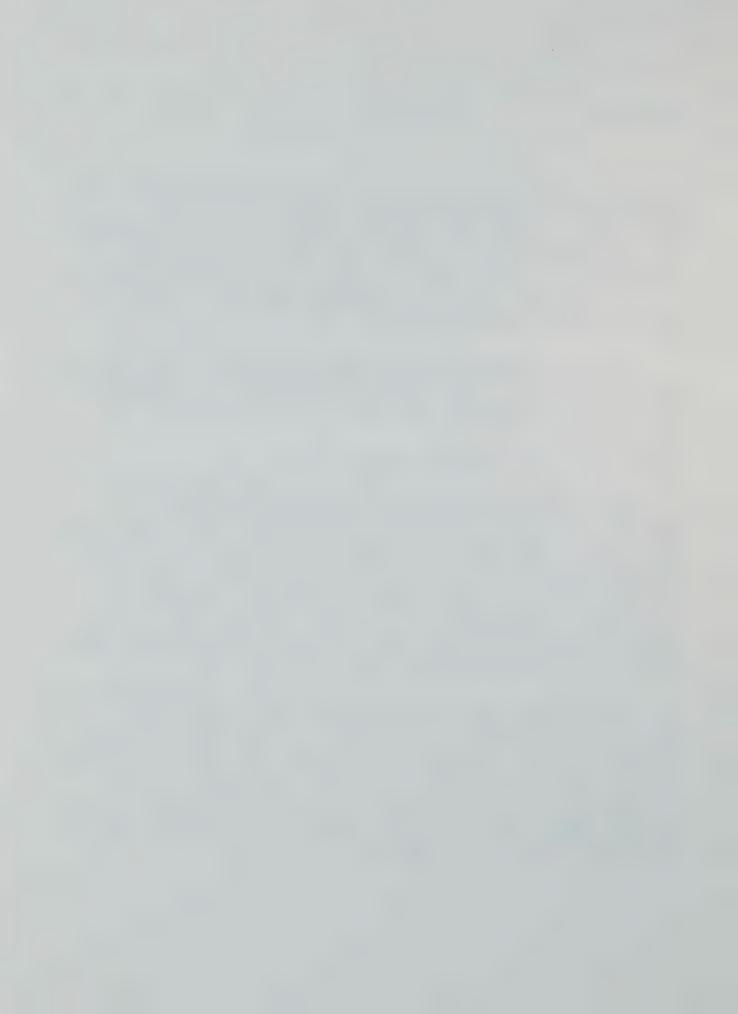
final site selection and summarize how that decision meets the requirements and conditions of the Chapter 91 Waterways Regulations. If the final siting selection involves displacement of a water dependent use, the Draft Section 61 findings should provide information that assures that there is no involuntary displacement of the industry and that the project proponent can provide comparable facilities if needed, pursuant to 310 CMR 9.36(5). If neither site is ultimately selected, a Notice of Project Change pursuant to 301 CMR 11.17 should be filed with MEPA.

A number of agencies have stepped forward to assist the MBTA in resolving these issues. These agencies include Massport, the Boston Redevelopment Authority, and the Boston Transportation Department. I encourage the MBTA to take advantage of the opportunity for assistance.

# Urban Design Issues/Project Design

Many of the comments received on the FEIR/EIS proposed relocating the main entrances to the Courthouse Station. In general, the concerns involve issues of public safety and pedestrian access related to the proposed mid+block location of the project. The MBTA should examine the option of relocating the headhouses to signalized intersections at Pittsburgh or Sleeper Streets. Alternatively, if the headhouses cannot be relocated, the MBTA should consider additional measures to improve public safety at the mid-block location. The Draft Section 61 Finding should report on the final decision for the location of the headhouses and/or implementation of additional public safety and pedestrian measures at mid-block.

The design of the catenary system in the eastern section of the project will need to consider the special requirements of the Boston Marine Industrial Park (BMIP). The system must be designed to accommodate the movement of large heavy equipment necessary for the operations at the BMIP. In addition, as the project makes a transition into more residential areas, the urban design elements should be sensitive to the residential neighborhood. The Draft Section 61 Finding should report on how project design will accommodate operations at the BMIP, and what design measures will be incorporated to enhance compatibility with the residential neighborhood.



8

# Traffic/Pedestrian

The FEIR/EIS illustrates anticipated operation problems at the D Street/Massport Haul Road intersection. The comments of the Boston Transportation Department (BTD) note that it has been reviewing this situation and requests the MBTA meet with representatives of the Massachusetts Highway Department (MHD), Massport and BTD to explore alternative circulation patterns at this location. BTD also noted that the information it requested on the proposed angle parking on New Congress Street was not included in the FEIR/EIS. The MBTA should work with BTD to resolve the issues outlined in BTD's comments on the FEIR/EIS and report on the outcome in the Draft Section 61 Finding.

The comments of the Boston Shipping Association (BSA) are particularly critical of the traffic assessment and mitigation related to providing adequate access for trucks to and from the port. In particular, conflicts between bus operations and truck operations at key intersections may require further mitigation. The roadway segment from Summer Street to Northern Avenue at D Street Extension is of specific concern to the Shipping Association.

Based on my review of the FEIR/EIS and of the comments . received, it appears that there may have been some difficulty coordinating with respect to data and construction mitigation planning between the Central Artery/Tunnel Project and the MBTA's Transitway Project. This has resulted, in some cases, in less than satisfactory analysis, as noted in the BSA comments. This problem is also reflected in the comments of the Atlantic Avenue Abutters Group. Although the Central Artery/Tunnel Project is the lead agency in the Dewey Square area, coordination of the transportation agencies is critical to assure that the conditions of the Phase I waiver, granted last summer to allow accelerated coordinated construction in the Dewey Square area, are fulfilled. In particular, the waiver was based in part upon a commitment of the MBTA and the CA/T Project to work with the Atlantic Avenue Abutters Group and others on the development of appropriate construction mitigation plans.

Coordination is critical to the Phase I waiver obligations of the MBTA, and I respectfully request that the two projects work together to improve communication. The Draft Section 61 Finding should include mitigation commitments based on shared data and joint analysis, and should be responsive to the comments of the BSA and the Atlantic Avenue Abutters Group.



# Additional Concerns Related to Project Coordination

9

Several of the comments received requested that I ensure that the design of the Transitway is compatible with the North Station-South Station Rail Link. During my review of the Phase I waiver request related to construction at Dewey Square, an important consideration was that this early construction did not foreclose future opportunities for the rail link. I support the concept of avoiding alternatives that may foreclose transportation improvements in the future. The Draft Section 61 Finding should report on the compatibility of the final design of the Transitway project with respect to the North Station-South Station rail link. In this context I again encourage internal coordination between agencies with the Executive Office of Transportation and Construction.

# Dredging and Dredged Material Disposal

10

The project is expected to generate 637,500 cubic yards of excavate material. Although significant analysis of sediments has been completed, the construction methodology for work in the Fort Point Channel has not been selected. The comments received on the FEIR/EIS offer many details regarding preferred methods. Consultation with the Massachusetts Coastal Zone Management (MCZM) office and DEP is recommended. In addition, it is clear that the disposal of excavated material should be coordinated with the Central Artery/Tunnel Project. The Draft Section 61 Finding should report on the selection of the construction methods and the opportunities for coordinating disposal of material.

# Noise Impacts

11

The City of Boston Environment Department reiterated its objections to the use of Federal Transit Administration, (FTA) criteria for determining acceptable operating noise levels. The MBTA and the Boston Environment Department should meet to determine if the agencies can develop mutually acceptable noise criteria. The Draft Section 61 Finding should report on the results and also clarify how noise will be monitored when the Transitway is operational.



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# Minimum Operable Segments

The FEIR/EIS evaluated a full build alternative and two Minimum Operable Segments (MOS) alternatives. The MOS alternatives represent components of the overall project and could be implemented in phases. It appears that the funding of the project, through the Federal Transit Administration, may not be fully available over the planned implementation period. Based on the anticipated negative impacts associated with the two MOS alternatives, I urge the MBTA to consider alternative financing that would ensure timely implementation of the project. The Conservation Law Foundation suggests that the MBTA consider joint development as an alternative to federal funding. The Draft Section 61 Findings should consider ways that the project can be implemented in a timely manner so that impacts associated with the MOS alternatives can be minimized or avoided.

# Site Specific Issues

A number of the comments received on the FEIR/EIS involved the identification of localized and parcel specific impacts. To the extent that these issues are germane to the overall project development, they should be reported on in the Draft Section 61 Findings. I urge the MBTA to continue to coordinate with individual property owners during the preparation of the Draft Section 61 Finding and the finalization of project design.

February 16, 1994

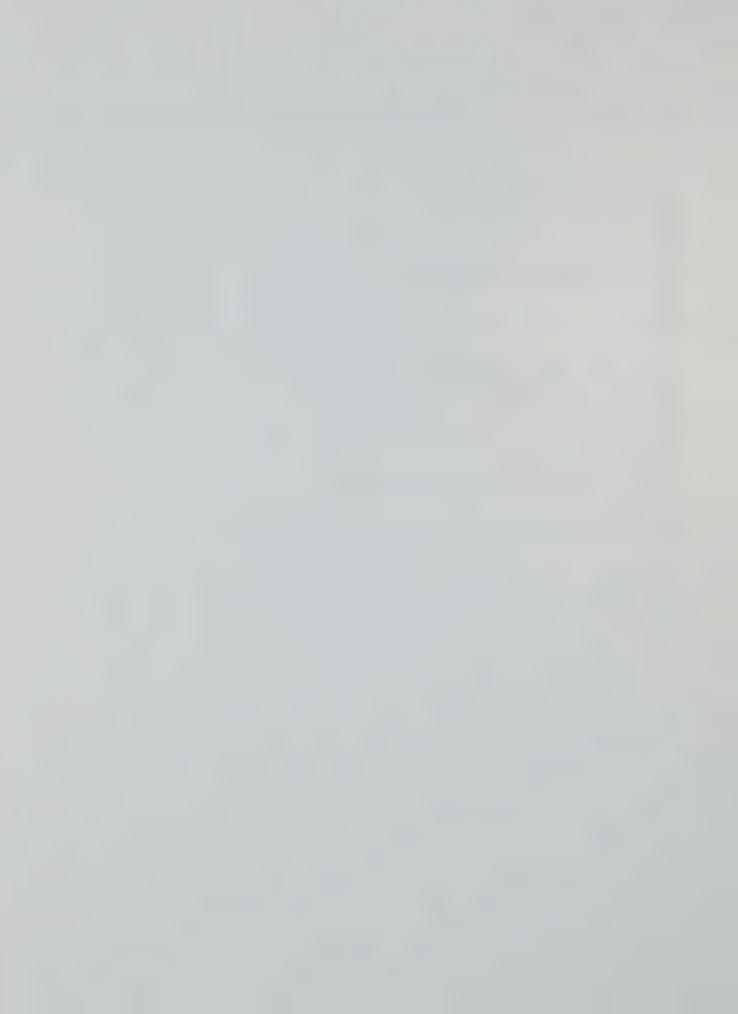
Date



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Comments received :
  CA/T
  MHC
  BTD
  GSA
  Boston Environment Department
  MAPC
  DEP
  MCZM
- Massport
  CLF
  Davis, Malm and D'Agostine
  Boston Shipping Association
  The John Drew Company
Sierra Club
Hill and Barlow
  Boston Edison
  Peabody and Arnold
  McCourt-Broderick Limited partnership
  Anthony Athanas
  Trans 21
  Pappas Management
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TC/JD/jd

P:FEIR6826



# Commonwealth of Massachusetts Executive Office of Environmental Affairs

#### Comment 1:

Although most of the major issues are nearing resolution, it is clear that certain aspects of the project are still evolving. Accordingly, I believe that the agencies and the public can benefit from a review of the MBTA's Draft Section 61 Findings for the Transitway. I, therefore, require that the MBTA file a Draft Section 61 Finding with MEPA, and circulate it to all agencies involved in the review or permitting of the project and to those who commented on the FEIR/FEIS. I will notice the Draft Section 61 Finding in the Environmental Monitor for a 30-day public comment period for receipt of commentary that will be considered in the Final Section 61 Finding.

#### Response:

The Massachusetts Bay Transportation Authority (MBTA) agrees that preparation and circulation of a Draft Section 61 Finding for the South Boston Piers Transitway is advantageous for a number of reasons. First, it resolves two major decisions remaining at the conclusion of the Final Environmental Impact Statement/Final Environmental Impact Report (FEIS/FEIR): location of the Transitway's maintenance facility and acquisition vs. underpinning of the New England Seafood Center. Second, it serves as a public statement of the MBTA's finding of impact resulting from construction and operation of the Transitway, and it identifies proposed mitigation for all adverse impacts. Third, it enables the MBTA to respond to the many comments received on the Transitway's FEIS/FEIR. Finally, the Draft Section 61 Finding's 30-day comment period affords the public and permitting agencies an additional opportunity to review and respond to the MBTA's plans for implementation of the Transitway Project.

The Draft Section 61 Finding consists of three major sections. The first section briefly describes the Transitway Project and the environmental review process conducted to date. The second discusses resolution of the two decisions remaining at the conclusion of the FEIS/FEIR, and the third section summarizes the impacts of and mitigation for construction and operation of the Transitway. The appendix contains responses to all comments received on the FEIS/FEIR.

#### Comment 2:

If it is determined that the best solution for the project and the Seafood Center involves taking of the building, a suitable alternative site in the Piers area should be found. The Draft Section 61 Finding should provide additional information on this decision and should provide assurance that there is no involuntary displacement of the industry, pursuant to 310 CMR 9.36(5).

### Response:

The New England Seafood Center is located on a 4.4-acre parcel at 145 Northern Avenue and is bordered by the East Service Road on the west, B Street on the east, and Congress Street (and the proposed New Congress Street) on the south. The land and building are owned by eight partners of the Massachusetts partnership known as the New England Seafood Center Associates.

The Center consists of a brick and concrete structure containing fish processing and wholesale distribution companies, as well as a nightclub in the northernmost portion of the building. The building contains approximately 85,600 square feet and was built in two sections. The section that fronts on Northern Avenue was constructed in 1954, and the rear portion was constructed in 1970.



The building has loading docks on the east, west, and south sides. Truck access is maintained around the entire building. The non-fish tenant, the nightclub known as "Polly-Estas," also has a loading dock where beverages are handled. All loading docks required for fish processing require refrigeration. The portion of the lot that is not utilized by either the building, access ways, or loading docks is occupied by parking spaces used by employees and occasional visitors. In the evening, the lot is also used by patrons of the nightclub.

Two options have been considered relative to the construction of the Transitway Project through the New England Seafood Center property. These include acquiring the Seafood Center and subsequently demolishing it during construction, or structurally underpinning the building and constructing the Transitway tunnel beneath it. Although the building does not lie within the South Boston Designated Port Area (DPA), it does lie within Chapter 91 jurisdictional boundaries. Acquisition and demolition of the building would therefore require the relocation of all tenants. Additionally, building demolition would result in an expansion of the anticipated area of construction-related disruption and an increase in the project-related volume of demolition wastes. Underpinning would not require the relocation of tenants and would avoid the associated impacts of building demolition.

Upon completion of the project's FEIS/FEIR, the MBTA further investigated the two options for the New England Seafood Center, working closely with agencies such as the Massachusetts Port Authority (Massport), Massachusetts Highway Department (MHD) and the Central Artery/Tunnel (CA/T) Project, Boston Transportation Department (BTD), Boston Redevelopment Authority (BRA), and Economic Development and Industrial Corporation (EDIC), as well as with the Seafood Center owners and occupants. Issues regarding future land uses, roadway improvements, construction schedules, and costs were discussed and evaluated. Since this coordination effort did not result in an acquisition plan that was acceptable to all parties, the MBTA proposes to underpin, rather than acquire, the New England Seafood Center. Underpinning, which will not require the relocation of Seafood Center tenants, is technically feasible and is less expensive than an acquisition.

The MBTA recognizes that construction of the Transitway tunnel through the New England Seafood Center property will require coordination with a number of parties, including area property owners, adjacent businesses, and nearby construction projects. A conceptual design for the proposed underpinning of the Seafood Center consists of jacking pipepiles under the existing foundation and constructing steel framing for support of the building. This method requires jacking and receiving pits on the east and west sides of the building, which must be accessible to the surface. All other work will occur underground and will have little or no effect on the structure during and upon completion of construction. During construction, access to the jacking and receiving pits will require close coordination with the Seafood Center tenants to ensure adequate loading dock space, access around the site, maintenance of power for refrigeration, and parking. Any potential disruption of operations during MBTA construction will require mitigation by the MBTA. The MBTA will work with tenants of the Seafood Center, the CA/T Project, and other adjacent projects as the underpinning scheme is designed to further identify impacts and mitigation. Maintenance of traffic plans during underpinning of the Seafood Center by the MBTA will consider such mitigation measures as accommodation of Center truck traffic in adjacent streets, construction during nighttime hours, off-site parking, and loading area reconfiguration. These maintenance of traffic plans will be coordinated with any plans approved for the CA/T Project.



#### Comment 3:

Two sites were evaluated for use as a storage and maintenance facility: a site on Summer Street and a site on First Street. Summer Street is the MBTA's preferred site. The preferred site currently has a water-dependent use whereas the proposed use would be non-water-dependent. The MBTA should continue to work with the DEP regarding the siting issues related to Chapter 91. The Draft Section 61 Finding should report on the final site selection and summarize how that decision meets the requirements and conditions of the Chapter 91 Waterways Regulations. If the final siting selection involves displacement of a water-dependent use, the Draft 61 Findings should provide information that assures that there is no involuntary displacement of the industry and that the project proponent can provide comparable facilities if needed, pursuant to 310 CMR 9.36(5). If neither site is ultimately selected, a Notice of Project Change pursuant to 301 CMR 11.17 should be filed with MEPA.

#### Response:

In the FEIS/FEIR, the MBTA analyzed two potential sites for the Transitway Project's maintenance and storage facility. Site A is located at the corner of Summer Street and Pappas Way, while Site B is located on West First Street between E Street and Pappas Way; both sites are located within Chapter 91 jurisdiction. These two sites were screened from a larger number of potential sites, and both were deemed appropriate for location of a maintenance and storage facility to support the Transitway Project.

After several meetings with Massport and Pappas Management Corporation, the owners or representatives of the owners of the two sites under consideration, the MBTA has selected Site B on West First Street for location of the Transitway Project's maintenance and storage facility. The site is preferable over Site A given that no impact to existing water-dependent uses would result. Site B also meets several other important design criteria:

- Selection of this site will not displace any existing water-dependent use. This criterion is particularly important, since the economic vitality of South Boston depends in large part on the area's water-dependent businesses and industries. A portion of Site A located at the corner of Summer Street and Pappas Way is currently used for Subaru overflow vehicle parking; since these vehicles are transported by water, this overflow parking lot is determined to be a water-dependent use. Although Site B is also within Chapter 91 jurisdiction, it does not contain any existing water-dependent uses. It is, therefore, a more desirable location for the Transitway's maintenance facility. Tenants of the site, which is predominantly owned by Massport and partially owned by Atlantic, Inc., include Fortress Records, Corporate Printing Company, Shaughnessy Warehouse, Roadway Trucking, PPG Industries, Yankee Bus, Emerson College, NYNEX, U.S. Postal Service parking, Boston Harbor Industrial Development Corporation, and E Street Associates.
- The site is roughly one-half mile from the Transitway portal, and is located along a future Transitway route to residential South Boston as part of the full build configuration. This location thus minimizes non-revenue producing trips (i.e., "deadheading") for transit vehicles beginning or ending their service routes. It also reduces the need to install additional catenary (overhead wires that provide electrical power to the trackless trolley vehicles) as part of the full build Transitway to extend surface service into residential South Boston; catenary will simply be extended from the West First Street facility. The ability to utilize the same catenary for non-revenue trips to the maintenance facility and revenue trips into residential South Boston as part of the full build Transitway will reduce both one-time construction and ongoing operating and maintenance costs. In addition, combined use of the catenary will limit potential adverse environmental impacts, including



visual and aesthetic impacts of the overhead catenary and support structures. This is an important issue as the Piers area streetscape evolves.

- The surrounding area is compatible with activities associated with the Transitway's
  maintenance and storage facility. The site is adjacent to other light industrial
  development, and the area in which it is located is expected to remain in such use
  for the long term. No residential or commercial areas will be affected.
- The site is physically suited to development as a maintenance and storage facility.
   There are a few structures on the site that would need to be removed. Utility service is adequate, eliminating the need for costly infrastructure work. The parcel is regularly shaped, enabling its efficient use for construction and operation of the facility.
- No hazardous waste spills or releases were identified at this site, based upon review of files of the U.S. Environmental Protection Agency and the Massachusetts Department of Environmental Protection.

#### Comment 4:

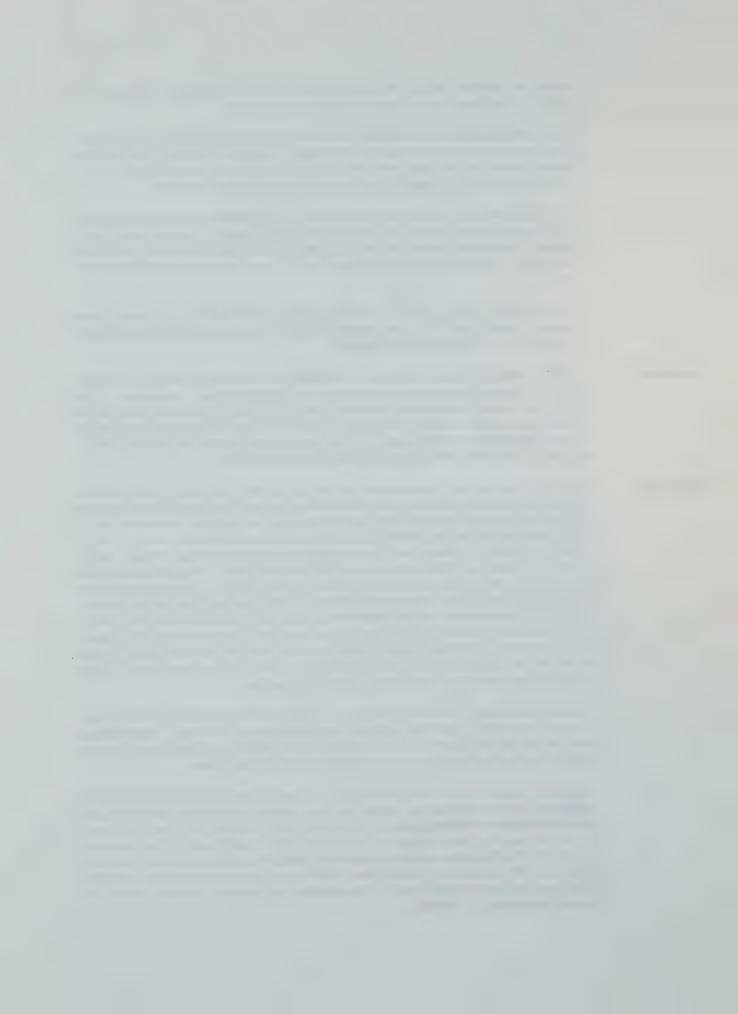
The MBTA should examine the option of relocating the headhouses of the Courthouse Station to signalized intersections at Pittsburgh or Sleeper Streets. Alternatively, if the headhouses cannot be relocated, the MBTA should consider additional measures to improve safety at the mid-block location. The Draft Section 61 Finding should report on the final decision for the location of the headhouses and/or implementation of additional public safety and pedestrian measures at mid-block.

#### Response:

The MBTA has met with public agencies, including the BTD, BRA, MHD, and the General Services Administration, and private interests, such as the McCourt-Broderick Limited Partnership and the Children's Museum, to address concerns about Courthouse Station as documented in comment letters submitted on the project's FEIS/FEIR. Issues discussed with these public and private interests include safety, pedestrian access, and future development in the Piers area. After consideration of the various concerns and competing interests identified and discussed in these meetings, the MBTA has determined that the location of the Courthouse Station, including the headhouses as proposed in the FEIS/FEIR, is appropriate, and should not be changed. However, other mitigation measures to address concerns expressed during meetings with public and private interests will be implemented. These measures are discussed later in this section, following a brief description of the rationale for the proposed Courthouse Station siting decision.

The two Piers area Transitway stations — Courthouse and World Trade Center Stations — were sited to provide maximum transit coverage of the area. These stations were sited by the MBTA with input from state and city planners, including the BRA and Massport, as well as from Piers area property owners and developers.

Alternative locations for Courthouse Station at Sleeper and Pittsburgh Streets were considered during station siting. Neither of these locations is as advantageous as the proposed Farnsworth Street location. Of primary importance is that the Courthouse Station be as close as possible to the new Federal Courthouse. The proposed Farnsworth Street location is directly opposite (although a block away from) the main entrance of the Courthouse. Although a Courthouse Station shifted west to Sleeper Street would be dramatically sited on the waterfront, engineering for such a shift is not feasible for a number of reasons.



Specifically, the proposed Courthouse Station platforms are located on a tangent (i.e., straight) section. Moving the station west would place the platforms on a curve. Since a tangent section is required for station platforms, the Transitway alignment west of Sleeper Street would need to be redesigned. Such a realignment is not feasible, however, since it would result in an adverse impact to the abutment of the New Northern Avenue Bridge. Alternatively, the current proposed platform location could be maintained, and the headhouses relocated to Sleeper Street. This extension of the accessways to Courthouse Station would result in a much larger and more costly station. Furthermore, the construction of the New Northern Avenue Bridge immediately adjacent to Sleeper Street headhouses would pose safety problems for transit passengers entering or exiting the station. Cars coming off the incline of the New Northern Avenue Bridge will reach grade at the intersection of Sleeper Street and New Northern Avenue. As cars come down the incline, they are likely to be accelerating. Similarly, as motorists approach the bridge incline, their natural instinct would be to accelerate. The safety of Transitway station users and other pedestrians could be jeopardized by the six lanes of accelerating traffic and motorists with poor sight lines at the intersection of Sleeper Street and New Northern Avenue.

A station location at Pittsburgh Street would be located too far from the Federal Courthouse, existing development along the western edge of the Fort Point Channel, and a potential future water shuttle terminal at Fan Pier. It is desirable from both wayfinding and urban design perspectives that the headhouses be as close as possible to, and visible from, the channel and the Fan Pier. Along with the future Federal Courthouse, these are two of the Piers area's strongest geographical features.

The Courthouse Station location at the western edge of the Piers area was chosen specifically to serve existing developments, including Museum Wharf (consisting of the Children's Museum, Computer Museum, and Boston Tea Party Ship Museum) and the Boston Wharf Company. Approximately one-third of existing development in the Piers area is focused there. This development consists primarily of office uses, which generate a high level of trip demand per square foot of development.

A one-quarter mile walk radius was used to analyze station locations with respect to their ability to serve area development. To avoid overlap of these radii and maximize the cost-effectiveness of the project, the two stations were spaced roughly one-half mile apart. The northwest entrance to Courthouse Station is located across from the new Federal Courthouse at Fan Pier (within a two-minute walk distance), and a southwest entrance provides access to the Boston Wharf Company buildings and to Museum Wharf. Using a one-quarter mile walk distance, Courthouse Station will also serve developments in the easternmost portion of the Financial District, including International Place.

In their comments on the Transitway's Draft Environmental Impact Report, officials from the Computer Museum stressed that the Courthouse Station should remain as close to Museum Wharf as possible. Museum Wharf currently attracts over a million visitors each year, and museum directors believe that convenient, accessible transit is likely to capture a considerable portion of these visitors and Museum staff if the service meets their needs. Needs include a short walk distance from the Transitway station, and easily accessible vehicles that can accommodate strollers, baby carriages, and wheelchairs. Future transportation developments, such as water shuttle services expected to dock at Fan Pier, and the existing Northern Avenue Bridge, which is proposed for conversion as an enhanced pedestrian walkway, would also be well-served by station headhouses in the vicinity of Farnsworth Street.



Based on these factors, the MBTA believes that the Piers area would be ill-served by a relocation of Courthouse Station. While the MBTA recognizes that pedestrian safety is of paramount concern given the midblock location of station headhouses in the vicinity of Farnsworth Street, such headhouse locations have been successful elsewhere in the MBTA system. For example, the Kendall and Kenmore Stations are at mid-block locations. Easy access to these stations is achieved in several ways. At Kenmore Station, headhouses on either side of Commonwealth Avenue lead to a mezzanine, while passengers accessing Kendall Station are eased across the highly defined mid-block crossing by flags set into the median of Main Street in Cambridge and a pedestrian actuated signal.

As described in the FEIS/FEIR, Courthouse Station will be designed with a mezzanine accessible from both sides of New Northern Avenue. Other mitigation measures that the MBTA commits to implement with approval from such agencies as the BTD include the following:

- Courthouse Station entrance/exit at Pittsburgh Street. The headhouse located at the southeastern corner of New Northern Avenue and Pittsburgh Street will be open as a Courthouse Station entrance/exit. Previously, this headhouse was designated as an emergency exit only, with the main station entrance/exit headhouses located on both sides of New Northern Avenue in the vicinity of Farnsworth Street. The designation of all three headhouses for station entrance/exit will improve pedestrian circulation at Courthouse Station, and will now allow pedestrians to access the station at the New Northern Avenue/Pittsburgh Street signalized intersection.
- Installation of a barrier. A fence or other barrier along the New Northern Avenue median would prevent mid-block crossings. The current median plan for New Northern Avenue does not provide for any such barrier. The MBTA will work with other agencies, such as the BRA, on the final landscaping plan for the New Northern Avenue median. In combination with a median barrier, a pedestrian actuated signal could be installed at the midblock headhouse location. A change in the color and material of the crossing could also be provided to alert motorists that this is a pedestrian crossing. At a minimum, the crosswalk striping here should be very wide so motorists have a strong visual cue that crossings may occur.
- Clear signage and graphics. Provision of clear signage and graphics both at
  the station level underground and at the street level will greatly facilitate
  communication with pedestrians. Prominent below level signage will direct exiting
  passengers to the appropriate side of New Northern Avenue so they can reach
  their destinations without crossing the street at the surface. Headhouses at street
  level will be marked by a strong and highly visible design. It is also the intention of
  the MBTA to have a community relations person in the station to answer questions
  and direct station users to destinations in the Piers area.

# The design of the catenary system in the eastern section of the project will need to consider the special requirements of the Boston Marine Industrial Park (BMIP). The system must be designed to accommodate the movement of large heavy equipment necessary for the operations at the BMIP. In addition, as the project makes a transition into more residential areas, the urban design elements should be sensitive to the residential neighborhood. The Draft Section 61 Finding should report on how project design will accommodate operations at the BMIP, and what design measures will be

incorporated to enhance compatibility with the residential neighborhood.



#### Response:

Inherent in the trackless trolley technology is the overhead catenary system with its supports and power supply elements. Appropriate design of this system incorporated into the streetscape can enhance the project's aesthetic impact. To mitigate any potential negative aesthetic impacts of the project, the Transitway's surface catenary system will be designed in conjunction with other streetscape elements in the South Boston Piers area. The MBTA is currently working with, and will continue to work with, the South Boston Streetscape Committee which has been convened to develop a design for the Piers area's streetscape; committee members include representatives from the City of Boston, Massport, and CA/T Project. The MBTA will integrate design of the catenary system associated with surface operation of Transitway trackless trolley vehicles with the area's streetscape elements, including lighting, trees, and signage. This integration will ensure compatibility and cohesion of the area's streetscape.

Design specifications for the Transitway catenary system will be established to accommodate the operation of trucks and heavy equipment on surface streets. The special requirements of BMIP, which involve the operation of cranes and other heavy equipment associated with maritime industries, will require particular attention as design specifications are developed. Extension of Transitway service into residential South Boston, scheduled for the year 2008, will also require sensitive design solutions. Overhead catenary on South Boston neighborhood streets will be designed to be consistent with the scale and residential character of the area. However, the potential exists that an alternative, non-catenary, propulsion system may be available for revenue service on this residential South Boston route by 2008. The MBTA will evaluate any appropriate new technology as design on this segment of the Transitway is advanced. In addition, the MBTA will continue to work with BMIP and the South Boston residential community as design of the surface Transitway routes progresses.

#### Comment 6:

The FEIR/EIS illustrates anticipated operation problems at the D Street/Massport Haul Road intersection. The comments of the Boston Transportation Department (BTD) note that it has been reviewing this situation and requests the MBTA meet with representatives of the Massachusetts Highway Department (MHD), Massport and BTD to explore alternative circulation patterns at this location. BTD also noted that the information it requested on the proposed angle parking on New Congress Street was not included in the FEIR/EIS. The MBTA should work with BTD to resolve the issues outlined in BTD's comments on the FEIR/EIS and report on the outcome in the Draft Section 61 Finding.

#### Response:

#### D Street Corridor and Massport Haul Road/D Street

In the South Boston Piers Transit Project's FEIS/FEIR, the intersection of D Street and Massport Haul Road was shown to operate at level of service (LOS) E in the initial build Transitway only. The LOS E rating, which does not indicate an intersection failure, is due in part to the operation of surface shuttle buses needed in the initial build Transitway to provide connections between the Piers area and rapid transit transfer stations in midtown Boston. These shuttle buses are eliminated once the full build Transitway is extended to the Orange and Green Lines at Chinatown Station and Boylston Station, respectively, and the Massport Haul Road/D Street intersection was shown to improve to LOS D.

Since traffic analysis for the transit project's FEIS/FEIR was prepared, however, the CA/T Project has performed additional analysis of traffic circulation in the Piers area. In April 1994, the CA/T Project prepared a *South Boston Truck Access and Circulation Study* to support the project's Consolidated Chapter 91 license application. The truck



study was based on the CA/T Project's Proposed Action as approved by the Secretary of Environmental Affairs in his Certificate dated January 2, 1991, and was prepared to assist the Massachusetts Department of Environmental Protection (DEP) and other interested parties, including the BTD and the Boston Shipping Association (BSA), in assessing the effect of the CA/T Project on truck access to the South Boston DPA.

Through a D Street corridor analysis, the truck study documented that intersection operations were affected by the queuing of vehicles between the closely-spaced intersections of the D Street corridor, including the Transitway portal. The study proposed to mitigate these conditions by providing a grade separation of D Street and the Massport Haul Road, and by connecting Summer Street and the Massport Haul Road by a new "Pumphouse Connector Road" opposite E Street.

During the process of addressing DPA truck access issues, Federal Highway Administration (FHWA) concerns regarding the preliminary design for this area of the CA/T Project were being addressed. Resolution of the FHWA concerns resulted in proposed design refinements to the CA/T Project's Proposed Action. Accordingly, the CA/T Project initiated an amended truck study in June 1994 based on a traffic network that includes the design refinements, and also includes the two proposed mitigation measures for the D Street corridor (grade separation of D Street and Massport Haul Road and construction of the Pumphouse Connector Road). As with the April 1994 truck study, the traffic networks showing traffic volumes in the amended truck study area include the Transitway operations.

At the same time, the CA/T Project initiated an in-depth coordination process with state and city transportation agencies and interested parties on both the amended truck study and a Notice of Project Change (NPC) for the design refinements to the project. Coordination includes a series of meetings that will be ongoing during the period of preparation of both the amended truck study and the NPC. Parties invited to participate in the process include the MBTA, Massport, DEP, BTD, BRA, EDIC, BSA, and The Boston Harbor Association.

As of August 31, 1994, four coordination meetings were held, which are temporarily suspended due to the CA/T Project's consideration of further design refinements. Thus far, the scope, methodology, and network assumptions for both the amended truck study and the NPC have been discussed at these meetings. The CA/T Project is currently preparing responses to questions raised and to various participants' requests for additional traffic-related information. Sensitivity analyses are also being prepared to respond to specific issues raised during the meetings. The CA/T Project expects to resume the meetings in the near future. Future meeting agendas include review of traffic analyses and findings, and review of traffic mitigation measures and implementation requirements for both the amended truck study and the NPC.

This public process provides exceptional opportunities for the participants to share in the development of the traffic analyses for the amended truck study and the NPC, to contribute to the process of ascertaining the causes contributing to potential traffic problems, and to identify appropriate mitigation measures. The focus of the truck study and any amendments is to ensure that truck access to port areas is maintained throughout CA/T Project construction and in the full build design year of 2010. The CA/T Project construction period coincides with Transitway construction, and operations of both the Transitway and Third Harbor Tunnel will continue in the 2010 design year. Through its participation in the development of the amended truck study, the MBTA will ensure that Transitway construction impacts and operations are fully



addressed, and any combined impacts are mitigated in a coordinated and effective manner. Thus, BSA and BTD concerns will be addressed through this process.

#### Angle Parking on New Congress Street Under the Bus/TSM Alternative

No angle parking on New Congress Street is contemplated as part of the Transitway Project. Angle parking on New Congress Street was proposed as part of the Bus/Transportation System Management (TSM) Alternative defined in the FEIS/FEIR. Such a parking arrangement was necessitated under this alternative as the result of the proposed construction of a bus lane on New Congress Street. To permit construction of this bus lane, curb lane parking was proposed to be moved to the median of New Congress Street and arranged in an angle configuration in order to avoid a loss in the net number of relocated spaces.

The MBTA recognizes the undesirability of a bus lane in the curb lane and angle parking along the median of New Congress Street. The BTD, BRA, and City of Boston Environment Department (BED) all expressed serious concerns about TSM measures deemed necessary by the MBTA as part of the Bus/TSM Alternative to support transit demand in the Piers area. In part as a result of these concerns, the MBTA rejected the Bus/TSM Alternative in favor of the full build Transitway as the locally preferred alternative for the project; however, the definition of the Bus/TSM Alternative was not altered in the FEIS/FEIR. The MBTA does not advocate the creation of angle parking if traffic safety is compromised. Again, angle parking is not proposed as part of Transitway Project implementation.

#### Comment 7:

The comments of the Boston Shipping Association (BSA) are particularly critical of the traffic assessment and mitigation related to providing adequate access for trucks to and from the port. In particular, conflicts between bus operations and truck operations at key intersections may require further mitigation. The roadway segment from Summer Street to Northern Avenue at D Street Extension is of specific concern to the Shipping Association.

#### Response:

In response to criticism received from the BSA and others on the traffic assessment and mitigation developed by the CA/T Project for the South Boston's DPA as described in the project's draft *South Boston Truck Access and Circulation Study* of January 1994, the CA/T Project published a substantially revised final report in April 1994. This final report, which was based on the CA/T Project's 1991 FSEIS/R in accordance with Chapter 91 license requirements, addressed issues raised by BSA and others, including performance of corridor analysis for D Street between Summer Street and Northern Avenue. As described in the response to the previous comment, the MBTA, BSA, Massport, BTD, and others all participated in the preparation of this final report, and are currently participating in revised analysis based on the CA/T Project's proposed action to be documented in a forthcoming NPC.

In addition, the MBTA has met with BSA to discuss the potential impacts of the Transitway's surface component on trucks operating in the DPA. The Transitway has been designed with the goal of reducing total passenger vehicle traffic in the South Boston Piers area. This goal is served by attracting riders to high occupancy vehicles and by placing these vehicles in a tunnel in the most congested parts of the area. Surface operation of the Transitway vehicles and supplemental buses in the eastern portion of the Piers area is also designed to avoid conflicts with truck operations. Achievement of these goals is evidenced by a significant reduction in surface congestion resulting from Transitway implementation as compared to the no action scenario. The MBTA has shown that without the Transitway in the year 2010, three



intersections in the project area are projected to operate at LOS E, and another three operate at LOS F. In contrast, the initial build Transitway significantly improves traffic congestion; no intersection failures occur, and only one intersection was shown in the FEIS/FEIR to operate at LOS E. (It should be pointed out that this LOS E intersection is at D Street and Massport Haul Road, the intersection that has been proposed for grade separation by the CA/T Project as part of their South Boston Truck Access and Circulation Study.) Once the full build Transitway is constructed, all intersections in the project area were shown to operate at LOS D or better. Thus, the Transitway clearly has a beneficial impact on surface congestion in the South Boston Piers area and the DPA. The MBTA will continue to work with the BSA, BTD, and CA/T Project as plans for Transitway implementation are advanced to ensure that any potential conflicts between Transitway surface operations and trucks are minimized and appropriately mitigated.

#### Comment 8:

Based on my review of the FEIR/EIS and of the comments received, it appears that there may have been some difficulty coordinating with respect to data and construction mitigation planning between the Central Artery/Tunnel Project and the MBTA's Transit-way Project. This has resulted, in some cases, in less than satisfactory analysis, as noted in the BSA comments. This problem is also reflected in the comments of the Atlantic Avenue Abutters Group. Although the Central Artery/Tunnel Project is the lead agency in the Dewey Square area, coordination of the transportation agencies is critical to assure that the conditions of the Phase I Waiver, granted last summer to allow accelerated coordinated construction in the Dewey Square area, are fulfilled. In particular, the waiver was based in part upon a commitment of the MBTA and the CA/T Project to work with the Atlantic Avenue Abutters Group and others on the development of appropriate construction mitigation plans.

Coordination is critical to the Phase I waiver obligations of the MBTA, and I respectfully request that the two projects work together to improve communication. The Draft Section 61 Finding should include mitigation commitments based on shared data and joint analysis, and should be responsive to the comments of the BSA and the Atlantic Avenue Abutters Group.

#### Response:

Coordination between the MBTA and the CA/T Project has been rigorous and ongoing. The MBTA and CA/T Project meet both regularly and on an ad hoc basis to discuss issues relevant to both projects. This coordination has yielded numerous benefits, most notably an agreement by the MBTA and MHD to jointly construct the Transitway and northbound Central Artery in Dewey Square as part of the CA/T Project's C11A1 contract. Joint construction of the two projects affords considerable cost savings to the state and substantially reduces the environmental impacts that would otherwise be associated with two separate major construction projects.

Such coordination, including involvement by the Atlantic Avenue Abutters Group in the development of a construction mitigation plan for Dewey Square, also satisfies requirements of the MBTA's Phase I waiver which permits accelerated coordinated construction of the Transitway and northbound Central Artery as part of the C11A1 contract.

As part of C11A1, the MHD will construct Transitway elements, including utilities relocation, the Transitway station and turnaround loop at South Station, and tunnel from Essex Street to 200 feet south of Congress Street. Since publishing the FEIS/FEIR in December 1993, there has been much progress in the development of construction staging plans, the location of work zones, and the facilitation of pedestrian



movements during construction, particularly to the South Station/Dewey Square area. The phasing plans also maintain Red Line operations during construction.

The MBTA, CA/T Project, BTD, and Atlantic Avenue Abutters Group have coordinated to develop a vehicular and pedestrian traffic mitigation plan for the Dewey Square/South Station area. In late 1993, the CA/T Project and MBTA commenced weekly meetings with the Abutters Group and BTD (separate and combined) to communicate and coordinate the construction phasing and sequencing, focusing on traffic and pedestrian mitigation. In addition, the comprehensive coordination process established by the CA/T Project and MBTA has involved meetings with abutters, including the Federal Reserve Bank, One Financial Center, and Beacon Management, on an individual basis to address those companies' special concerns. By the end of March 1994, with contributions from the Abutters Group and BTD, the CA/T Project and MBTA completed the preliminary construction phasing plans for the C11A1 contract.

The construction phasing documents reflect mitigation measures to address as many of the concerns as possible that were communicated during the coordination process. One concern that was discussed in detail was the need to occupy all four corners of Dewey Square during a portion of one construction phase, for a period of approximately six months. Limiting construction to three corners was demonstrated to the Abutters Group as having significant schedule and cost impacts, totalling an additional six months of construction at an additional cost of \$10 million. As a result of these adverse impacts, it was concluded that limiting construction to only three corners during all phases of construction was not feasible.

Mitigation measures agreed to by the CA/T Project, MBTA, and Atlantic Avenue Abutters Group are incorporated in the contract documents for C11A1. The following lists some of the specific items concerning work zones and pedestrian movements that were negotiated by the Atlantic Avenue Abutters Group, MBTA, and CA/T Project:

- Sidewalks dedicated for pedestrian travel around Dewey Square shall remain continuous and unobstructed during the designated restricted periods between 7:00 to 9:00 A.M. and 3:30 to 6:30 P.M. At other times, momentary obstruction of pedestrians for passage of equipment and material over sidewalks may occur. Police details will coordinate the movement of both construction equipment and pedestrians along the sidewalks abutting South Station.
- Work outside of fixed barricade work zones shall only be performed at night, will be
  properly cordoned off, and will be neatly and safely covered with flush fitting nonslip type coverings for pedestrian use by 6:30 A.M.
- The C11A1 construction staging plans will maximize pedestrian areas wherever
  possible and will be of satisfactory widths to satisfy pedestrian level of service
  (LOS) analyses. Additionally, there will be contract requirements to "pull back"
  certain sensitive areas when possible.
- All sidewalks will be kept clear at all times, and repairs shall be made immediately
  to remedy any deficient sidewalk surface conditions. Snow and ice will be removed
  from sidewalks around work areas and be kept free of ice at all times.
- Safe and clearly maintained crosswalks at all major intersections will be provided.
   The project will be coordinated with BTD to assure that all pedestrian crosswalks are given appropriate attention.



Additional measures discussed with the Atlantic Avenue Abutters Group to improve access during construction will be included as part of the C11A1 contract documents. These measures, which are contained in the Agreement Between the Massachusetts Highway Department and the Atlantic Avenue Abutters Group as to Goals for Construction Period Maintenance of Pedestrian and Vehicular Environment, will be implemented by the contractor during construction if feasible.

The Draft Section 61 Finding for the South Boston Piers Transitway Project contains mitigation commitments based on shared data and joint analysis performed by the MBTA and CA/T Project. The MBTA and CA/T Project commit to continued coordination throughout the design and construction of both projects.

#### Comment 9:

Several of the comments received requested that I ensure that the design of the Transitway is compatible with the North Station-South Station Rail Link. During my review of the Phase I waiver request related to construction at Dewey Square, an important consideration was that this early construction did not foreclose future opportunities for the rail link... The Draft Section 61 Finding should report on the compatibility of the final design of the Transitway project with respect to the North Station-South Station Rail Link.

#### Response:

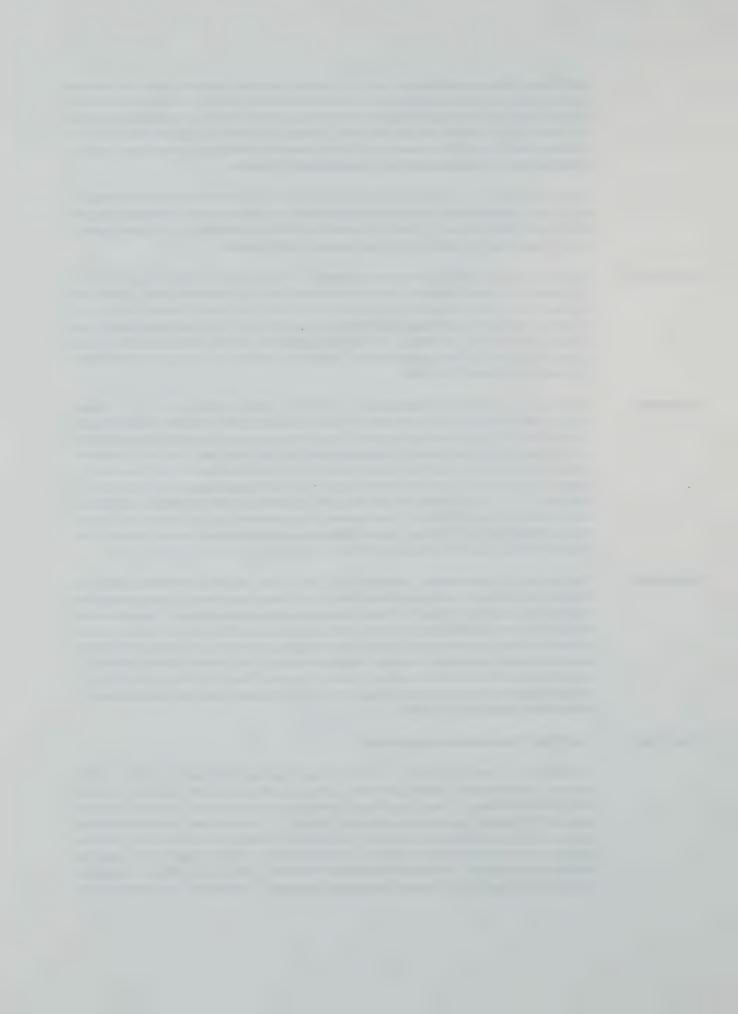
The South Boston Piers Transitway and its early construction contract at Dewey Square will have no impact on and is fully compatible with the North Station-South Station Rail Link as currently proposed. The current proposed plan shows that the Rail Link will be constructed *beneath* the depressed Central Artery box, and the Transitway will be constructed *above* the Central Artery box. Construction of the Transitway in Dewey Square as part of the CA/T Project's C11A1 construction contract will not foreclose future opportunities for the Rail Link. Approval to jointly construct Transitway elements with the northbound Central Artery was received in the Executive Office of Environmental Affair's Phase I waiver following submission and public review of an Environmental Assessment/Notice of Project Change by the MBTA in April 1993.

#### Comment 10:

The project is expected to generate 637,500 cubic yards of excavate material. Although significant analysis of sediments has been completed, the construction methodology for work in the Fort Point Channel has not been selected. The comments received on the FEIR/EIS offer many details regarding preferred methods. Consultation with the Massachusetts Coastal Zone management (MCZM) office and DEP is recommended. In addition, it is clear that the disposal of excavated material should be coordinated with the Central Artery/Tunnel Project. The Draft Section 61 Finding should report on the selection of the construction methods and the opportunities for coordinating disposal of material.

## Response: Fort Point Channel Crossing Method

The MBTA has met with the U.S. Army Corps of Engineers (USACOE), MCZM, DEP, and the Conservation Law Foundation to discuss the Fort Point Channel crossing construction methods. Based on these meetings and analysis of both the immersed tube and cofferdam construction methods, the MBTA has selected the semi-confined concrete immersed tube construction method over the cofferdam as the preferred alternative for the crossing of the Fort Point Channel. This method minimizes total construction duration, in-water construction duration, and costs, and enhances the ability to successfully mitigate environmental impacts. Specifically, the semi-confined



concrete immersed tube can be constructed 11 to 13 months faster than the cofferdam; has a 30-week, versus a 68-week, in-water construction period; is estimated to cost \$3.5 million less than the cofferdam method; and can be constructed in an environmentally sound manner, as discussed below. In addition, the use of semiconfined dredging techniques will limit dredged material volumes to amounts similar to those resulting from the cofferdam method.

Immersed tube construction involves channel dredging within a semi-confined area. Two parallel rows of steel sheeting will be driven into the channel bed along the alignment to preclude the necessity of side-sloping excavation. This sheeting will extend approximately six inches above the channel bottom. The channel bed between the rows of sheeting will then be excavated, or dredged, to the necessary depth. Upon proper preparation of the channel bed, a single tube section, constructed off-site and sealed at each end, will be floated into position over the dredged alignment and lowered (or "sunk") into place. Crossing of the channel will require three such sections and will result in a navigational constraint of approximately one-half the width of the channel at any given time. Upon completion of construction, the tunnel will be covered with clean, compatible materials.

The cofferdam construction method differs from the immersed tube method in that all construction would occur in place. This method would have entailed installation of a sheet pile cofferdam across one-half of the Fort Point Channel, while leaving the remaining half of the channel open for tidal flushing and navigation. Once the cofferdam was installed, the confines of the cofferdam would be cross-braced, dewatered, and excavated to the tunnel design depth; the Transitway tube would then be cast in place. Upon completion of the first half of the channel tunnel, the cofferdam would be removed and construction of the second half of the tunnel initiated. During this process, a portion of the first cofferdam would need to remain in place to maintain continuity between the two halves of the cofferdam crossing. Upon completion of the channel crossing, sheet piles used for the cofferdam would be cut at the mud line and left in place to ensure soil stability in the immediate vicinity of the tunnel.

In accordance with USACOE requirements, Tier I (data review) and Tier II (chemical evaluation) reports have been prepared that include descriptions of the Fort Point Channel crossing construction methodologies and sequencing, existing sediment conditions, and sediment dredging and disposal requirements and alternatives. A MCZM Federal Consistency Certification Statement, USACOE Section 404 Permit Application, and Section 401 Water Quality Certification have been filed which detail the construction methodology, sequencing, impacts, and mitigation measures for the preferred immersed tube channel crossing method.

The impact of increased levels of suspended solids on water quality during dredging is the most significant potential impact of the preferred channel crossing method. However, these impacts can be successfully mitigated through the use of silt curtains, modified dredging techniques, and continual water quality monitoring. The MCZM consistency review and the USACOE permit applications referenced above detail mitigation measures that include:

Use of a semi-confined dredging technique to limit the amount of sediments
to be dredged and disposed of. Steel sheeting will extend approximately six
inches above the channel bottom, preventing slumping of adjacent sediments into
the dredged area. This will shorten the dredging period, and will limit the dredge
volume to approximately that which would have been generated in the cofferdam
alternative.



- Use of a closing clamshell bucket on the dredge. A closing clamshell bucket similar to that used for the dredging of the Third Harbor Tunnel across the Boston Inner Harbor will help avoid sediment spillage over the top of the bucket and lead to a considerable reduction in the level of suspended solids during dredging operations. Water quality impacts can be further reduced by using care with the rate of bucket lifting.
- Use of silt curtains around the dredge site that extend to the channel bottom during all phases of the tidal cycle. Full depth vented silt curtains extending to the channel bottom will be installed around the dredging operation. Opening and moving of the curtains will be facilitated by raising the curtain bottom with ropes preattached to the ballast chain. Excessive ballooning of the curtains will be controlled by the use of curtain windows of sufficient area to allow passage of water through the curtains during tidal changes. These windows will be located as close to the flotation as possible to prevent the passage of the more turbid lower waters.
- Close and frequent monitoring of water quality at key receptor points. Monitoring of the water quality in the Fort Point Channel will be conducted during the dredging, screeding, and backfilling of the channel crossing project. Turbidity will be continually monitored in the tanks of Neptune Lobster Company and James Hook & Company in the channel mouth area between Fan Pier and the New England Aquarium, and at the Congress Street Bridge; water quality in the Fort Point Channel will be monitored on a weekly basis. Monitoring will be conducted for turbidity, suspended solids, heavy metals, and polynuclear aromatic hydrocarbon (PAH) compounds at discrete intervals of the water column, including the bottom.
- Development of contingency plans for sea water service for nearby consumers. Should the amount of suspended solids in the tanks of the two lobster companies be found to exceed a background of 50 milligrams per liter despite the mitigation efforts, temporary intakes will be extended to points beyond the mouth of the Fort Point Channel.

### Coordination with CA/T Project on Disposal of Excavated Material

The MBTA has coordinated with the CA/T Project in evaluating the disposal options for Transitway excavated materials. Analysis of excavate volumes and rates indicates that adequate capacity exists for suitable material from both projects. Coordination has also occurred between the two projects with respect to shared excavate handling and disposal efforts. As a result of this coordination, it has been agreed that Transitway sediments generated during work on the joint construction section (C11A1, "I-93 Northbound Tunnel Atlantic Ave.") will be handled and disposed of in accordance with the Memorandum of Understanding (MOU) between the CA/T Project and DEP.

The CA/T Project's MOU with DEP defines the procedures by which the project is to handle, test, treat, and reuse excavate material. As currently envisioned, these materials will be handled in accordance with the CA/T Project's materials processing program for handling excavate materials for reuse. Negotiations between the MBTA, CA/T Project, and DEP are ongoing to identify a mechanism by which the Transitway Project can be incorporated into the MOU.



Opportunities for continued coordination of excavate material from the two projects beyond the C11A1 contract are the subject of ongoing discussion between the MBTA and CA/T Project, and will continue to be explored during the final design and permitting phases of the Transitway Project. Communications with DEP are also being initiated to determine the degree to which the MBTA can participate in the MOU between the CA/T Project and DEP, thereby allowing the co-mixing of both projects' excavate. Although adequate disposal opportunities exist for separate handling and disposal of CA/T and Transitway Project excavate materials beyond the C11A1 contract, the suggested coordination between the two projects on this issue would have practical benefits. Specifically, such coordination could avoid or minimize a duplication of excavate handling and disposal efforts by two state transportation entities conducting similar and proximate excavation projects during an overlapping time frame. Procedures and facilities for the handling and disposal of excavate materials that will be established for the Transitway Project during its final design and permitting phases will reflect the results of this ongoing coordination with the CA/T Project and DEP.

#### Comment 11:

The City of Boston Environment Department reiterated its objections to the use of Federal Transit Administration (FTA) criteria for determining acceptable operation noise levels. The MBTA and the Boston Environment Department should meet to determine if the agencies can develop mutually acceptable noise criteria. The Draft Section 61 Finding should report on the results and also clarify how noise will be monitored when the Transitway is operational.

#### Response:

The MBTA has met with BED to discuss the Department's objections to the Federal Transit Administration's (FTA) criteria for acceptable operational noise levels. In general, BED argues in its comment letter on the FEIS/FEIR (and has argued in the past) that the FTA criteria are overly restrictive in urban areas. BED recognizes, however, that the MBTA is obligated by National Environmental Policy Act (NEPA) regulations to prepare its noise analysis in accordance with guidance provided by FTA. Likewise, while the MBTA recognizes BED's concerns with these noise criteria, the Transitway involves operation of rubber-tired vehicles in an underground tunnel, and operational noise is not expected to become an issue.

The MBTA is in the process of developing a new noise policy aimed at directing the Authority's approach to identifying and mitigating noise problems. This new policy, which is described in more detail in the responses to comments made by BED, will govern the monitoring of Transitway operational noise. A monitoring program could consist of periodic (once or twice a year) measurements of noise levels at sensitive receptor locations in the vicinity of Transitway operations.

#### Comment 12:

It appears that the funding of the project, through the Federal Transit Administration, may not be fully available over the planned implementation period. Based on the anticipated negative impacts associated with the two MOS alternatives, I urge the MBTA to consider alternative financing that would ensure timely implementation of the project. The Conservation Law Foundation suggests that the MBTA consider joint development as an alternative to federal funding. The Draft Section 61 Finding should consider ways that the project can be implemented in a timely manner so that impacts associated with the MOS alternatives can be minimized or avoided.

#### Response:

In the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, \$278 million of federal funds were authorized for the Transitway Project. These federal funds are earmarked for construction of the Transitway initial build segment from South Station to the World Trade Center. As noted in the FEIS/FEIR, federal funds currently



authorized cover approximately 64 percent of the Transitway initial build capital costs. The MBTA, with Congressional support, submitted a request in January 1994 for an additional \$72.7 million in federal authorization for the project. These additional dollars will bring the total ISTEA authorization to 80 percent of Transitway initial build capital costs. In the event that federal funds are delayed, the state could assume an increased share until such time as federal funds become available.

Given the high level of federal funding for the initial build segment and the aggressive schedule for the opening of revenue service in the year 2000, no alternative financing mechanisms are anticipated for the initial build Transitway. Such mechanisms may be more appropriate for extension of the Transitway to Boylston Station in the project's full build configuration.

To date, no federal dollars have been authorized by Congress for the full build segment of the Transitway extending from South Station to Boylston Station. The schedule for this segment anticipates design work beginning in the year 2000, with a construction start in 2003. The MBTA will work with its Congressional delegation to secure federal funds for this segment of the Transitway Project; 80 percent federal participation will be sought. In addition, the MBTA will continue to pursue alternative sources of funding for the project such as joint development with midtown development parcels (for example, Lafayette Place II and Parcel 30/Keith Block); privatization of certain project elements; and alternative financing arrangements, such as certificates of participation.





Office of the President

for Distinctive Dining

January 26, 1994

RE: Fort Point Channel Transit Project

Ms. Mary Beth Mello Deputy Administrator Federal Transit Administration-Region 1 U.S Department of Transportation 55 Broadway, Kendall Square Cambridge, MA 02142

Dear Ms. Mello:

As a well established restaurant owner and long-term land owner in the Fort Point Channel Area, I would like to go on record in support of the Fort Point Channel Transit Project. This public transportation project will further encourage me and others to invest private funds to develop what will one day be Boston's premier address.

One specific issue that I would like to raise concerns the location 13 of Courthouse Station. In light of the fact that plans no longer call for Farnsworth Street to be extended, it seems logical that Courthouse Station should be moved one block to the east so that the proposed headhouses occur on public ways. This appears to be a relatively minor change that would significantly increase the accessibility of the station to the public.

Sincerely,

Anthony Athenas

Chelhny Fateren as

President



# **Anthony Athanas**

Comment 13:

One specific issue that I would like to raise concerns the location of Courthouse Station. In light of the fact that plans no longer call for Farnsworth Street to be extended, it seems logical that Courthouse Station should be moved one block to the east so that the proposed headhouses occur on public ways.

Response:

The MBTA has met with public agencies, including the Boston Transportation Department (BTD), Boston Redevelopment Authority (BRA), Massachusetts Highway Department (MHD), and the General Services Administration, and private interests, such as the McCourt-Broderick Limited Partnership and the Children's Museum, to address concerns about Courthouse Station as documented in comment letters submitted on the project's FEIS/FEIR. Issues discussed with these public and private interests include safety, pedestrian access, and future development in the Piers area. After consideration of the various concerns and competing interests identified and discussed in these meetings, the MBTA has determined that the location of the Courthouse Station, including the headhouses as proposed in the FEIS/FEIR, is appropriate, and should not be changed. However, other mitigation measures to address concerns expressed during meetings with public and private interests will be implemented. These measures are discussed later in this section, following a brief description of the rationale for the proposed Courthouse Station siting decision.

The two Piers area Transitway stations – Courthouse and World Trade Center Stations – were sited to provide maximum transit coverage of the area. These stations were sited by the MBTA with input from state and city planners, including the BRA and Massport, as well as from Piers area property owners and developers.

Alternative locations for Courthouse Station at Sleeper and Pittsburgh Streets were considered during station siting. Neither of these locations is as advantageous as the proposed Farnsworth Street location. Of primary importance is that the Courthouse Station be as close as possible to the new Federal Courthouse. The proposed Farnsworth Street location is directly opposite (although a block away from) the main entrance of the Courthouse. Although a Courthouse Station shifted west to Sleeper Street would be dramatically sited on the waterfront, engineering for such a shift is not feasible for a number of reasons.

Specifically, the proposed Courthouse Station platforms are located on a tangent (*i.e.*, straight) section. Moving the station west would place the platforms on a curve. Since a tangent section is required for station platforms, the Transitway alignment west of Sleeper Street would need to be redesigned. Such a realignment is not feasible, however, since it would result in an adverse impact to the abutment of the New Northern Avenue Bridge. Alternatively, the current proposed platform location could be maintained, and the headhouses relocated to Sleeper Street. This extension of the accessways to Courthouse Station would result in a much larger and more costly station. Furthermore, the construction of the New Northern Avenue Bridge immediately adjacent to Sleeper Street headhouses would pose safety problems for transit passengers entering or exiting the station. Cars coming off the incline of the New Northern Avenue Bridge will reach grade at the intersection of Sleeper Street and New Northern Avenue. As cars come down the incline, they are likely to be accelerating. Similarly, as motorists approach the bridge incline, their natural instinct would be to accelerate. The safety of Transitway station users and other pedestrians



could be jeopardized by the six lanes of accelerating traffic and motorists with poor sight lines at the intersection of Sleeper Street and New Northern Avenue.

A station location at Pittsburgh Street would be located too far from the Federal Courthouse, existing development along the western edge of the Fort Point Channel, and a potential future water shuttle terminal at Fan Pier. It is desirable from both wayfinding and urban design perspectives that the headhouses be as close as possible to, and visible from, the channel and the Fan Pier. Along with the future Federal Courthouse, these are two of the Piers area's strongest geographical features.

The Courthouse Station location at the western edge of the Piers area was chosen specifically to serve existing developments, including Museum Wharf (consisting of the Children's Museum, Computer Museum, and Boston Tea Party Ship Museum) and the Boston Wharf Company. Approximately one-third of existing development in the Piers area is focused there. This development consists primarily of office uses, which generate a high level of trip demand per square foot of development.

A one-quarter mile walk radius was used to analyze station locations with respect to their ability to serve area development. To avoid overlap of these radii and maximize the cost-effectiveness of the project, the two stations were spaced roughly one-half mile apart. The northwest entrance to Courthouse Station is located across from the new Federal Courthouse at Fan Pier (within a two-minute walk distance), and a southwest entrance provides access to the Boston Wharf Company buildings and to Museum Wharf. Using a one-quarter mile walk distance, Courthouse Station will also serve developments in the easternmost portion of the Financial District, including International Place.

In their comments on the Transitway's Draft Environmental Impact Report, officials from the Computer Museum stressed that the Courthouse Station should remain as close to Museum Wharf as possible. Museum Wharf currently attracts over a million visitors each year, and museum directors believe that convenient, accessible transit is likely to capture a considerable portion of these visitors and Museum staff if the service meets their needs. Needs include a short walk distance from the Transitway station, and easily accessible vehicles that can accommodate strollers, baby carriages, and wheelchairs. Future transportation developments, such as water shuttle services expected to dock at Fan Pier, and the existing Northern Avenue Bridge, which is proposed for conversion as an enhanced pedestrian walkway, would also be well-served by station headhouses in the vicinity of Farnsworth Street.

Based on these factors, the MBTA believes that the Piers area would be ill-served by a relocation of Courthouse Station. While the MBTA recognizes that pedestrian safety is of paramount concern given the midblock location of station headhouses in the vicinity of Farnsworth Street, such headhouse locations have been successful elsewhere in the MBTA system. For example, the Kendall and Kenmore Stations are at mid-block locations. Easy access to these stations is achieved in several ways. At Kenmore Station, headhouses on either side of Commonwealth Avenue lead to a mezzanine, while passengers accessing Kendall Station are eased across the highly defined mid-block crossing by flags set into the median of Main Street in Cambridge and a pedestrian actuated signal.

As described in the FEIS/FEIR, Courthouse Station will be designed with a mezzanine accessible from both sides of New Northern Avenue. Other mitigation measures that the MBTA commits to implement with approval from such agencies as the BTD include the following:



- Courthouse Station entrance/exit at Pittsburgh Street. The headhouse located at the southeastern corner of New Northern Avenue and Pittsburgh Street will be open as a Courthouse Station entrance/exit. Previously, this headhouse was designated as an emergency exit only, with the main station entrance/exit headhouses located on both sides of New Northern Avenue in the vicinity of Farnsworth Street. The designation of all three headhouses for station entrance/exit will improve pedestrian circulation at Courthouse Station, and will now allow pedestrians to access the station at the New Northern Avenue/Pittsburgh Street signalized intersection.
- Installation of a barrier. A fence or other barrier along the New Northern Avenue median would prevent mid-block crossings. The current median plan for New Northern Avenue does not provide for any such barrier. The MBTA will work with other agencies, such as the BRA, on the final landscaping plan for the New Northern Avenue median. In combination with a median barrier, a pedestrian actuated signal could be installed at the midblock headhouse location. A change in the color and material of the crossing could also be provided to alert motorists that this is a pedestrian crossing. At a minimum, the crosswalk striping here should be very wide so motorists have a strong visual cue that crossings may occur.
- Clear signage and graphics. Provision of clear signage and graphics both at
  the station level underground and at the street level will greatly facilitate
  communication with pedestrians. Prominent below level signage will direct exiting
  passengers to the appropriate side of New Northern Avenue so they can reach
  their destinations without crossing the street at the surface. Headhouses at street
  level will be marked by a strong and highly visible design. It is also the intention of
  the MBTA to have a community relations person in the station to answer questions
  and direct station users to destinations in the Piers area.



# DAVIS. MALM & D'AGOSTIN

A PROFESSIONAL CORPORATION

ONE BOSTON PLACE BOSTON, MASSACHUSETTS 02108-4470

Julian J. D'Agostine C. Michael Malm Harold R. Davis Frank P. Conrad William F. Griffin, Jr. Paul E. Levenson Robert C. Gerrard John G. Serino John R. Berman Sidney J. Wartel Gary S. Matsko Judith Ashton John T. Lynch Grover S. Parnell, Jr. Robert J. Galvin John D. Chambliss Richard A. Nylen, Jr. Carol R. Cohen Howard P. Speicher Paul L. Feldman Kevin F. Long William J. Griset. Jr. Peter L. Koff Gary M. Feldman George A. Hewett Harold G. Clarke, Jr. Robert J. Diettrich J. Gavin Cockfield Ellen Donovan McCann Thomas S. Fitzpatrick Robert E. Richards, Jr. Jennifer L. Wilinsky Lori H. Freedman

TELEPHONE: (617) 367-2500 Telecopier: (617) 523-6215

February 9, 1994

#### HAND DELIVERED

Trudy Coxe, Secretary Executive Office of Environmental Affairs 100 Cambridge Street Boston, MA 02202

South Boston Piers/Fort Point Channel Transit Project

EOEA # 6826

Dear Ms. Coxe:

I represent The Atlantic Avenue Abutters Group, Inc., a group of property owners along Atlantic Avenue in Boston, which group includes The Beacon Companies, The Federal Reserve Bank, One Financial Center, and various other businesses, residential owners and occupants. This letter is written (1) to serve as comments on the Final Environmental Impact Statement/Report filed by the Massachusetts Bay Transportation Authority (MBTA), and (2) to express my clients concerns about the adequacy of the measures being taken by the Central Artery design team, in cooperation with the MBTA, to develop appropriate construction mitigation plans to fulfill the condition of your approval of the MBTA's Phase I waiver request, as stated in your Final Record of Decision, dated July 15, 1993.

My clients have been working intensively with the Artery team in order to reach acceptable staging plans during each of the several phases of the construction in the Dewey Square/South Station area so that the impacts to the uses of the commercial, retail, and residential buildings in this area are kept within acceptable limits. As you are aware, our concern is to ensure that construction work zones, traffic mitigation plans, and pedestrian sidewalks and street crossings are designed to preserve the basic functioning of the various buildings and land uses in the area. This area constitutes the center of intensive pedestrian traffic going to and from the Red Line and the other nearby buildings



Trudy Coxe, Secretary
Executive Office of Environmental Affairs
Page 2
February 9, 1994

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including South Station, which serves as the most significant regional transportation center in Boston.

The Atlantic Avenue Abutters Group has been reviewing and commenting upon the staging plans being developed by the Artery team. While the Artery team has been working diligently to respond to the concerns of the individual members of my client group and has incorporated some of their comments into revised staging plans, the pedestrian issues -- specifically with respect to access to South Station and movements through Dewey Square -- have still not been satisfactorily resolved.

Accordingly, my clients believe that the construction mitigation plans proposed by the Project, as these plans now exist, do not yet reflect appropriate and adequate construction mitigation measures. In particular, the staging plans and location of work zones create significant problems in terms of facilitating the concentrated pedestrian movements particular to the South Station/Dewey Square area. We believe that additional work is necessary on the part of the Artery team in order to satisfy the condition in your July 15, 1993 Final Record of Decision "that the MBTA and the Artery team will work with the Atlantic Avenue Abutters Group and others on the development of appropriate construction mitigation plans."

My clients are both encouraged and concerned by the Project's February 2, 1994 presentation. They are encouraged that the Artery staff clearly recognizes these issues but are concerned because the time is rapidly approaching that appropriate resolution be reached. More specific comments on the February 2nd presentation are contained in the enclosed copy of the letter from William N. McDonough, President of The Atlantic Avenue Abutters Group, to Peter Zuk and William Flynn.

My clients are also concerned that the specific pedestrian and traffic mitigation plans which they have reviewed do not, as claimed in Section 5.13.11 of the Final EIS/R, reduce pedestrian impacts (page 5-83) or sequence construction to limit surface construction to only one quadrant of Dewey Square at a time (page 5-85). Given the significant discrepancy between the statements in the EIS/R and the actual plans, we request that, as part of your Certificate on the Final EIS/R, the Massachusetts Highway Department (MHD) and/or MBTA be required to prepare for public comment revised (in the case of the MHD) or draft (in the case of the MBTA) Section 61 Findings which describe in detail, with references to the actual documents, the specific pedestrian and traffic mitigation plans (and other mitigation measures) to be implemented.



Trudy Coxe, Secretary
Executive Office of Environmental Affairs
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I wish to emphasize that in requesting and authorizing that I write this letter, my client does not intend to impede in any way its dialogue with the Project. Instead, this letter is intended to express the serious concerns of my client which require immediate attention and resolution.

In the event that we are not able to achieve appropriate resolution of these construction mitigation issues in our discussions with the Artery team, we will more explicitly invite the direct participation of you and your staff in the prompt resolution of our concerns.

Thank you for your attention to this important matter.

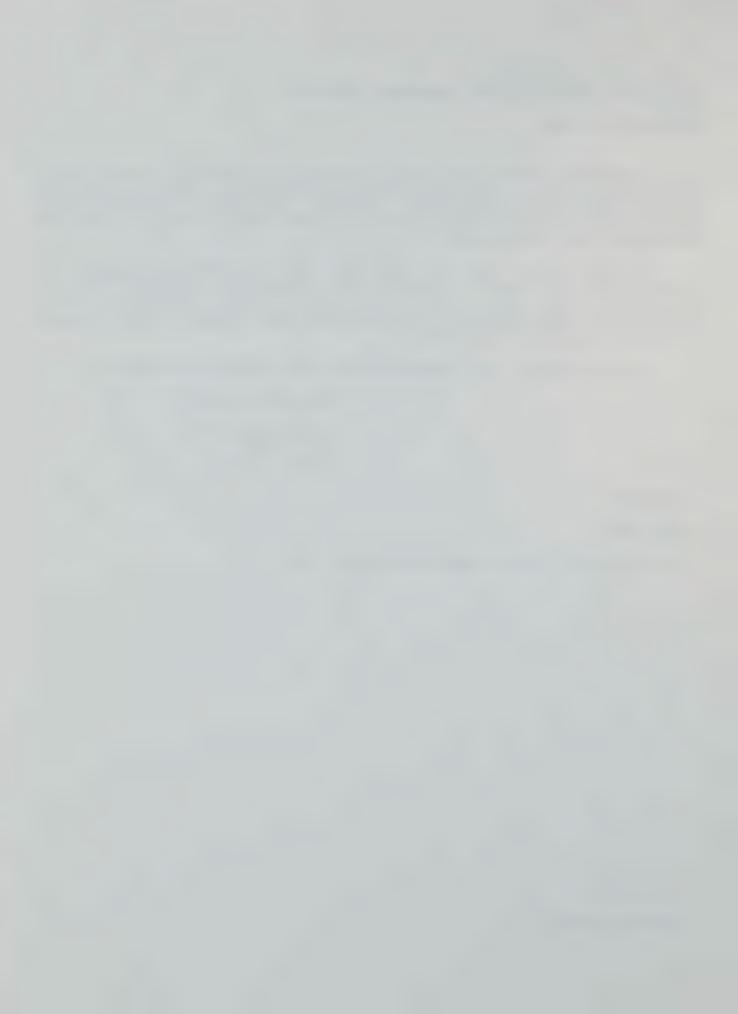
Sincerely yours,

Peter L. Koff

PLK/mtd

Enclosure

cc: Atlantic Avenue Abutters Group, Inc.



## Atlantic Avenue Abutters Group, Inc.

(Davis, Malm & D'Agostine)

#### Comment 14:

My clients believe that the construction mitigation plans proposed by the [CA/T] project, as these plans now exist, do not yet reflect appropriate and adequate construction mitigation measures. In particular, the staging plans and location of work zones create significant problems in terms of facilitating the concentrated pedestrian movements particular to the South Station/Dewey Square area. We believe that additional work is necessary on the part of the Artery team in order to satisfy the condition in your July 15, 1993 Final Record of Decision "that the MBTA and the Artery team will work with the Atlantic Avenue Abutters Group and others on the development of appropriate construction mitigation plans."

## Response:

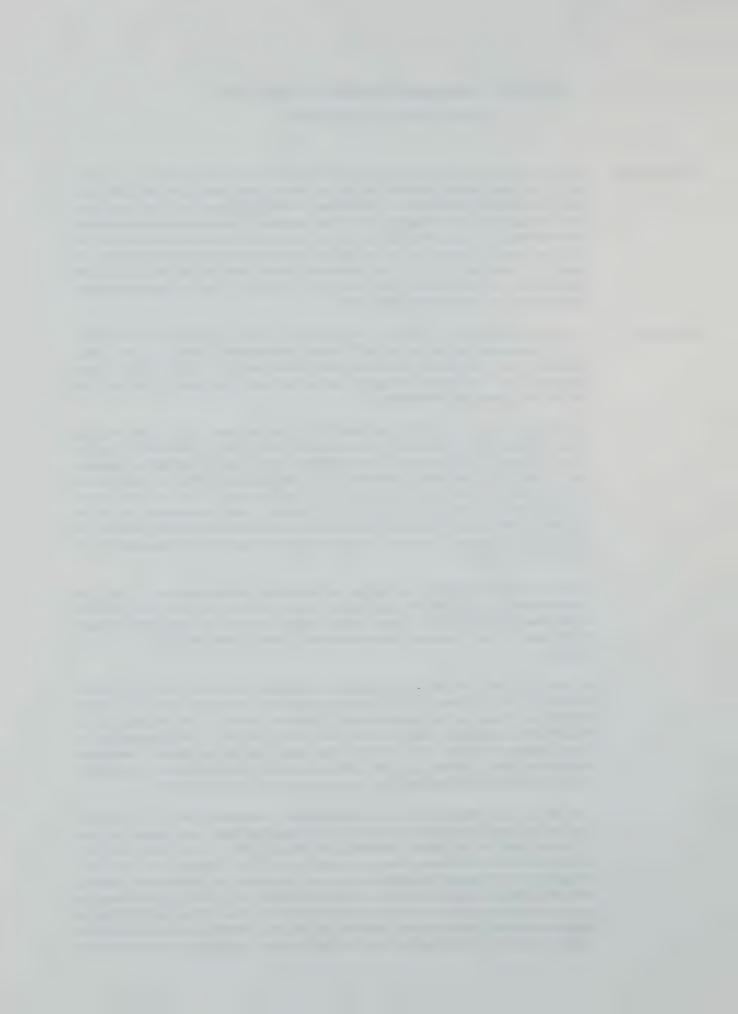
The South Boston Piers Transitway in the vicinity of Dewey Square and South Station will be constructed as part of the CA/T Project construction contract C11A1. Since publishing the FEIS/FEIR in December 1993, there has been much progress in the development of construction staging plans, the location of work zones, and the facilitation of pedestrian movements.

Coordination between the MBTA and the CA/T Project has been rigorous and ongoing. The MBTA and CA/T Project meet both regularly and on an ad hoc basis to discuss issues relevant to both projects. This coordination has yielded numerous benefits, most notably an agreement by the MBTA and Massachusetts Highway Department (MHD) to jointly construct the Transitway and northbound Central Artery in Dewey Square as part of the CA/T Project's C11A1 contract. Joint construction of the two projects affords considerable cost savings to the state and substantially reduces the environmental impacts that would otherwise be associated with two separate major construction projects.

Such coordination, including involvement by the Atlantic Avenue Abutters Group in the development of a construction mitigation plan for Dewey Square, also satisfies requirements of the MBTA's Phase I waiver which permits accelerated coordinated construction of the Transitway and northbound Central Artery as part of the C11A1 contract.

As part of C11A1, the MHD will construct Transitway elements, including utilities relocation, the Transitway station and turnaround loop at South Station, and tunnel from Essex Street to 200 feet south of Congress Street. Since publishing the FEIS/FEIR in December 1993, there has been much progress in the development of construction staging plans, the location of work zones, and the facilitation of pedestrian movements during construction particularly to the South Station/Dewey Square area. The phasing plans also maintain Red Line operations during construction.

The MBTA, CA/T Project, Boston Transportation Department (BTD), and Atlantic Avenue Abutters Group have coordinated to develop a vehicular and pedestrian traffic mitigation plan for the Dewey Square/South Station area. In late 1993, the CA/T Project and MBTA commenced weekly meetings with the Abutters Group and BTD (separate and combined) to communicate and coordinate the construction phasing and sequencing, focusing on traffic and pedestrian mitigation. In addition, the comprehensive coordination process established by the CA/T Project and MBTA has involved meetings with abutters, including the Federal Reserve Bank, One Financial Center, and Beacon Management on an individual basis, to address those companies'



special concerns. By the end of March 1994, with contributions from the Abutters Group and BTD, the CA/T Project and MBTA completed the preliminary construction phasing plans for the C11A1 contract.

The construction phasing documents reflect mitigation measures to address as many of the concerns as possible that were communicated during the coordination process. One concern that was discussed in detail was the need to occupy all four corners of Dewey Square during a portion of one construction phase, for a period of approximately six months. Limiting construction to three corners was demonstrated to the Abutters Group as having significant schedule and cost impacts, totalling an additional six months of construction at an additional cost of \$10 million. As a result of these adverse impacts, it was concluded that limiting construction to only three corners during all phases of construction was not feasible.

Mitigation measures agreed to by the CA/T Project, MBTA, and Atlantic Avenue Abutters Group are incorporated in the contract documents for C11A1. The following lists some of the specific items concerning work zones and pedestrian movements that were negotiated by the Atlantic Avenue Abutters Group, MBTA, and CA/T Project:

- Sidewalks dedicated for pedestrian travel around Dewey Square shall remain continuous and unobstructed during the designated restricted periods between 7:00 to 9:00 A.M. and 3:30 to 6:30 P.M. At other times, momentary obstruction of pedestrians for passage of equipment and material over sidewalks may occur. Police details will coordinate the movement of both construction equipment and pedestrians along the sidewalks abutting South Station.
- Work outside of fixed barricade work zones shall only be performed at night, will be
  properly cordoned off, and will be neatly and safely covered with flush fitting nonslip type coverings for pedestrian use by 6:30 A.M.
- The C11A1 construction staging plans will maximize pedestrian areas wherever
  possible and will be of satisfactory widths to satisfy pedestrian level of service
  (LOS) analyses. Additionally, there will be contract requirements to "pull back"
  certain sensitive areas when possible.
- All sidewalks will be kept clear at all times, and repairs shall be made immediately
  to remedy any deficient sidewalk surface conditions. Snow and ice will be removed
  from sidewalks around work areas and be kept free of ice at all times.
- Safe and clearly maintained crosswalks at all major intersections will be provided.
   The project will be coordinated with BTD to assure that all pedestrian crosswalks are given appropriate attention.

Additional measures discussed with the Atlantic Avenue Abutters Group to improve access during construction will be included as part of the C11A1 contract documents. These measures, which are contained in the Agreement Between the Massachusetts Highway Department and the Atlantic Avenue Abutters Group as to Goals for Construction Period Maintenance of Pedestrian and Vehicular Environment, will be implemented by the contractor during construction if feasible.

#### Comment 15:

My Clients are also concerned that the specific pedestrian and traffic mitigation plans which they have reviewed do not, as claimed in Section 5.13.11 of the Final EIS/R, reduce pedestrian impacts (page 5-83) or sequence construction to limit surface construction to only one quadrant of Dewey Square at a time (page 5-85).



## Response:

At the time the FEIS/FEIR was prepared, the Transitway station at South Station was not yet incorporated into the CA/T Project's C11A1 construction contract, and pedestrian and traffic mitigation plans for the Dewey Square area were incomplete. Although it was stated that construction would be sequenced so as to limit surface construction to only one quadrant of Dewey Square at a time, this plan reflected a separate South Station construction contract, not incorporation into C11A1. Once the Transitway station at South Station was incorporated into C11A1, as encouraged and endorsed by the Atlantic Avenue Abutters Group, it became impossible to stage construction in only one quadrant at a time.

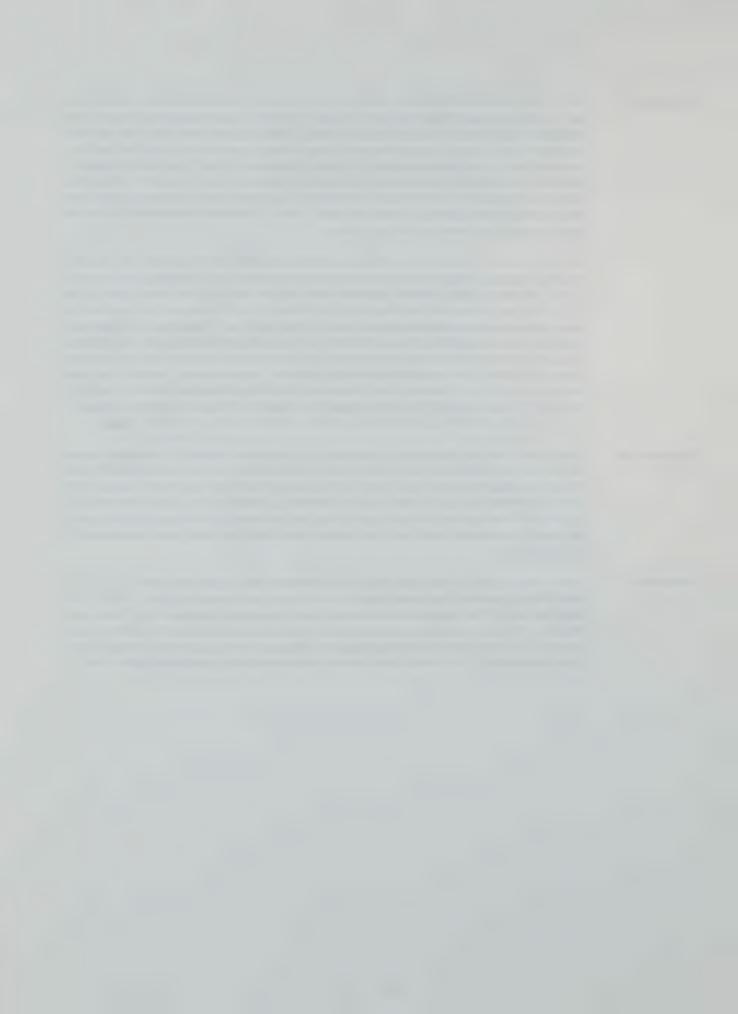
In paragraph 7.2 of its *Dewey Square Construction Mitigation Criteria*, the Atlantic Avenue Abutters Group recognized that incorporation of the Transitway station into C11A1 would prohibit limited surface construction impacts as described in the FEIS/FEIR, but requested that "no more than three of the four corners be occupied by work zones or construction activities of any kind at one time." This criterion will be met in all but one construction phase of C11A1; it has been demonstrated to the Atlantic Avenue Abutters Group that there are significant schedule and financial impacts associated with strict adherence to this criterion. Furthermore, adoption of this limitation in all C11A1 construction phases would violate another commitment made by the CA/T Project and MBTA to minimize the duration of construction activities in Dewey Square, which is a paramount goal of the Atlantic Avenue Abutters Group.

## Comment 16:

Given the significant discrepancy between the statements in the EIS/R and the actual plans, we request that, as part of your Certificate on the Final EIS/R, the Massachusetts Highway Department (MHD) and/or MBTA be required to prepare for public comment revised (in the case of the MHD) or draft (in the case of the MBTA) Section 61 Findings which describe in detail, with references to the actual document, the specific pedestrian and traffic mitigation plans (and other mitigation measures) to be implemented.

#### Response:

Since the FEIS/FEIR was published in December 1993, there has been significant work and progress in the development of traffic and pedestrian mitigation plans. The Draft Section 61 Finding describes the traffic and pedestrian impacts of the Transitway Project. Mitigation criteria developed through discussions between the MBTA, CA/T Project, BTD, and Atlantic Avenue Abutters Group are translated into the plans and specifications for C11A1 which are currently under review by prospective contractors.



January 26, 1994

## BY HAND

Ms. Mary Beth Mello, Deputy Regional Administrator U.S. Department of Transportation Federal Transit Administration - Region I 55 Broadway Cambridge, Massachusetts 02142

and

Secretary: EOEA 100 Cambridge Street - Room 2000 Boston, Massachusetts 02201

Attn: MEPA Unit: EOEA No. 6826

Re: Final Environmental Impact Report

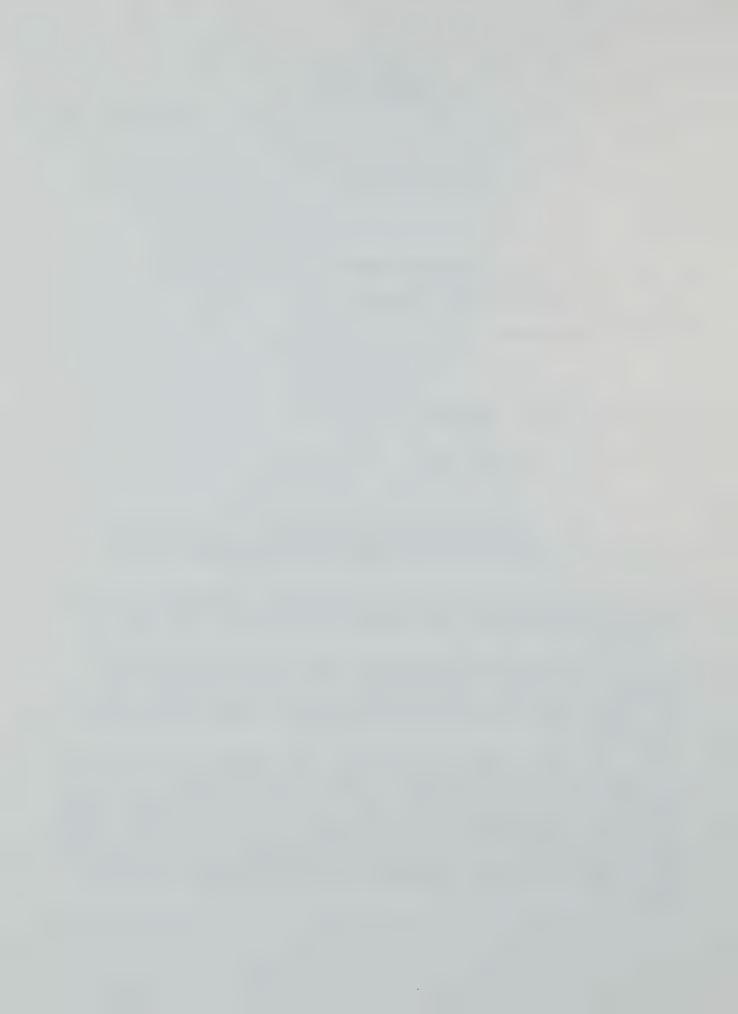
South Boston Piers/Fort Point Channel Transit Project

Massachusetts Bay Transportation Authority

The Boston Edison Company hereby submits its comments regarding the FEIR for the South Boston Piers/Fort Point Channel Transit Project - EOEA 6826 (Transitway).

Boston Edison endorses the construction of the full build option of the Transitway from a public transportation, infrastructure improvement, and environmental standpoint. Naturally, we support the use of electric vehicles for the Transitway, and stand ready to assist MBTA in their construction of the project.

From an operational standpoint, we note that the alignment of the Transitway is in conflict with our 115,000 volt transmission facilities both in the Fort Point Channel/Sleeper Street area and in the Avery Street area as well. There are plans to abandon the Fort Point Facilities as part of the Central Artery Project, but that work will not take place until at earliest mid-1996. MBTA should consult with us prior to scheduling work in that area. Also, regarding the conflicts, additional coordination between MBTA and Boston Edison Company is necessary to resolve the handling of electrical facilities within those areas.



January 26, 1994

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Ms. Mary Beth Mello Secretary: EOEA

In connection with the construction of the Transitway, it will be necessary to relocate utilities in conflict with the proposed alignment. Traditionally, these relocations are performed by the utilities at the expense of the proponent agency via force accounts. We note that approximately two million dollars have been provided for force accounts in the project estimate, and caution that additional funding may need to be provided in this area to cover utility costs.

The balance of Boston Edison's comments concern its parcel of land on Atlantic Avenue which the proposed Transitway will traverse before crossing Fort Point Channel.

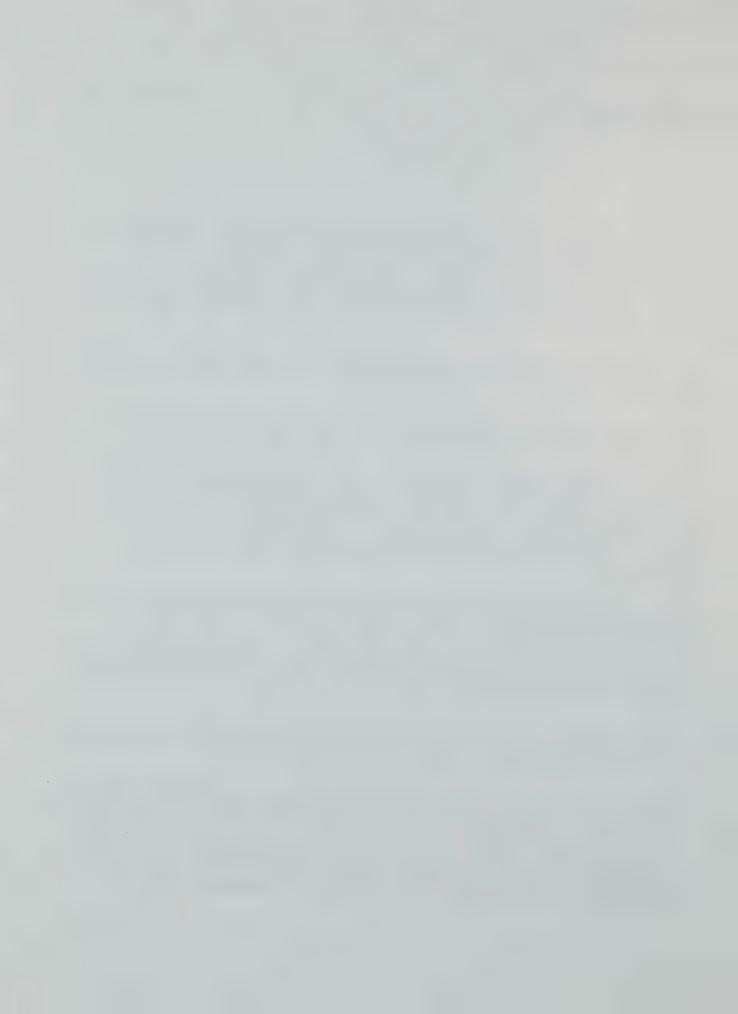
As has been discussed with the MBTA staff, the MBTA does not currently own or have rights of access to the area where the Transitway is now proposed.

In order to avoid a costly taking of the entire parcel by the Massachusetts Highway Department (MHD) as part of its Central Artery Project, a Utility Relocation Agreement (URA) was negotiated between Boston Edison and MHD. Boston Edison granted rights to MHD for the construction on the site of ventilation structures and the Transitway in a specified size and in a specific location different from what the MBTA now proposes under this application.

Based upon the previously proposed location of the Transitway detailed in the URA, and in recognition of the appropriate future use of the site as a commercial building, MHD and Boston Edison cooperated to design the vent building to be compatible with future development. Boston Edison also employed architects and engineers to design commercial structures on the site including a subsurface parking garage integral to future development of the parcel.

19 The new alignment of the Transitway severely impacts the plans made by MHD and Boston Edison, reduces the scope and viability of the subsurface parking area, and leaves the MBTA with no rights on the parcel.

However, Boston Edison believes it may be possible to cooperatively reach agreement to provide for the temporary and permanent easements required by the MBTA, while also satisfying the needs and interests of the other parties involved. In fact, Boston Edison and MHD have agreed to engage in a process of negotiation to develop an interim and long-term master plan for the site. As a condition of the Central Artery Project's Chapter 91 License, that process must include the MBTA and be concluded by September 1, 1994.



January 26, 1994

- 3 -

Ms. Mary Beth Mello Secretary: EOEA

Boston Edison expects that several issues left unanswered in the FEIR will be addressed in the negotiations: the boundaries of construction easements and permanent easements including emergency and maintenance access, the type of construction to be used on the site, the timing of construction and its coordination with MHD activities on the site, the design of the Transitway slurry walls to facilitate adjacent subsurface parking critical to the economic viability of the commercial development of the site, the reconstruction of the wharf removed or weakened by the construction of the Transitway, the responsibility for environmental clean-up, if any, caused by the MBTA construction, and the related compensation due Boston Edison.

We appreciate the opportunity to provide these comments and look forward to working with you and the MBTA toward the successful completion of this project.

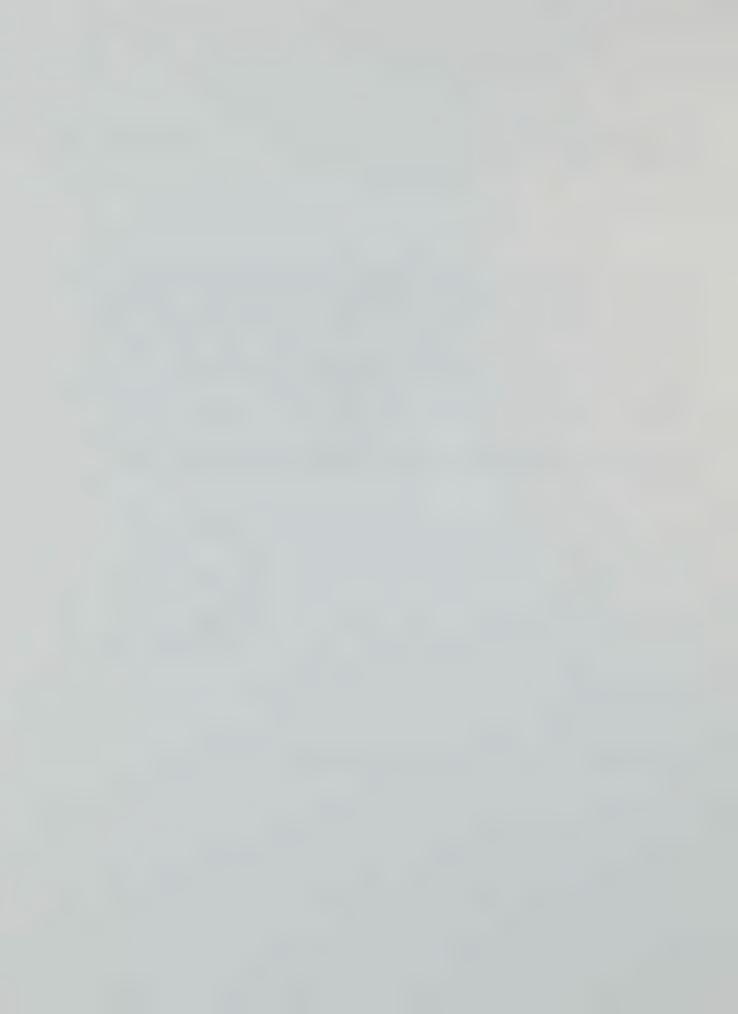
Sincerely,

Francis E. Silvia

Manager

CA/T Project Group

xc: Ms. Mary R. Ainsley, Project Manager - MBTA



## **Boston Edison**

#### Comment 17:

From an operational standpoint, we note that the alignment of the Transitway is in conflict with our 115,000 volt transmission facilities both in the Fort Point Channel/ Sleeper Street area and in the Avery Street area as well. There are plans to abandon the Fort Point Facilities as part of the Central Artery Project, but that work will not take place until at earliest mid-1996. MBTA should consult us prior to scheduling work in that area.

## Response:

The MBTA is aware of Boston Edison's 115 kV transmission facilities in the Fort Point Channel and Avery Street areas. Final design of Fort Point Channel crossing is not expected to begin until late 1994, with construction scheduled to commence after mid-1996 at the earliest. Based on Boston Edison's stated schedule, the MBTA will not need to access the Boston Edison property until after the Fort Point Channel substation is relocated and the 115 kV cable in the channel is removed. Construction under Avery Street is not scheduled to start until mid-2003. It should be noted, however, that a change in Boston Edison's schedule for abandonment of its Fort Point transmission facilities could adversely affect the Transitway construction schedule. Close coordination with Boston Edison during the final design of both sections of the Transitway is required to avoid any service interruptions.

#### Comment 18:

In connection with the construction of the Transitway, it will be necessary to relocate utilities in conflict with the proposed alignment. Traditionally, these relocations are performed by the utilities at the expense of the proponent agency via force accounts. We note that approximately \$2 million have been provided for force accounts in the project estimate, and caution that additional funding may need to be provided in this area to cover utility costs.

#### Response:

The force account line item shown in the capital costs for the Transitway Project do not reflect the cost of relocating utilities. Rather, this line item represents funds to be transferred from the MBTA to other public agencies — not public utilities — who will perform work as part of the Transitway Project. Utility relocation costs are included in construction line segment costs. The MBTA's construction contractors receive an allowance for utility relocations; these contractors then pay public utilities such as Boston Edison for the cost of relocating utilities necessitated by Transitway construction.

#### Comment 19:

The new alignment of the Transitway [at Russia Wharf] severely impacts the plans made by MHD and Boston Edison, reduces the scope and viability of the subsurface parking area, and leaves the MBTA with no rights on [Boston Edison's] parcel. However, Boston Edison believes it may be possible to cooperatively reach agreement to provide for the temporary and permanent easements required by the MBTA, while also satisfying the needs and interests of the other parties involved. In fact, Boston Edison and MHD have agreed to engage in a process of negotiation to develop an interim and long-term master plan for the site. As a condition of the Central Artery Project's Chapter 91 License, that process must include the MBTA and be concluded by September 1, 1994.

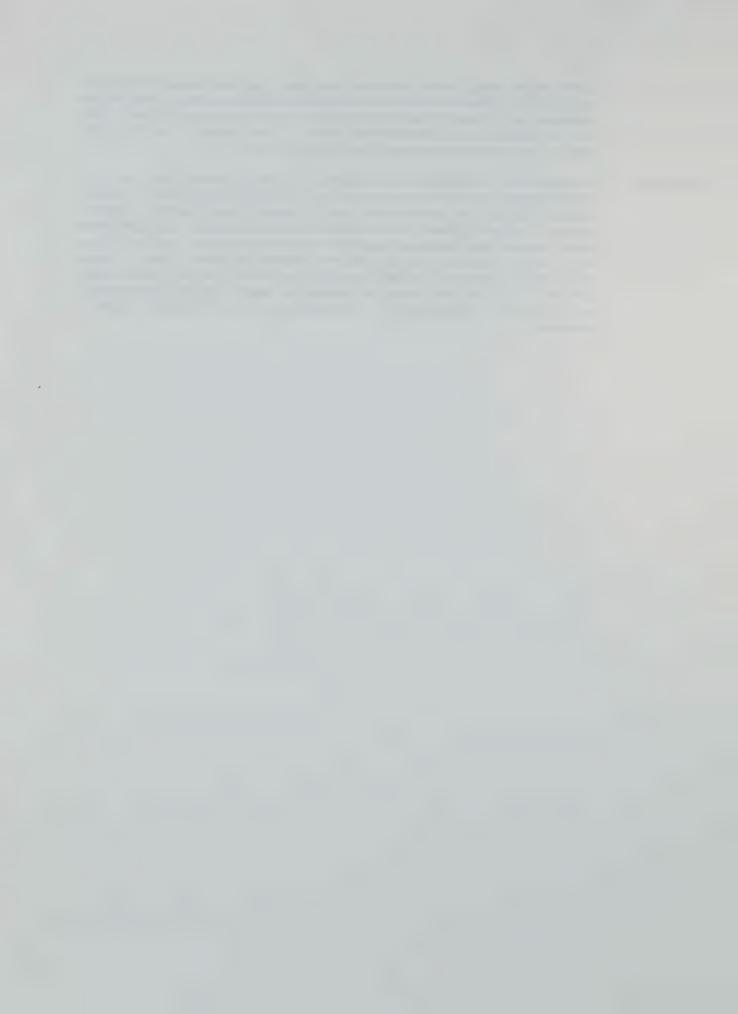
Boston Edison expects that several issues left unanswered in the FEIR will be addressed in the negotiation: the boundaries of construction easements and permanent easements including emergency and maintenance access, the type of construction to be used on the site, the timing of construction and its coordination with MHD activities



on the site, the design of the Transitway slurry walls to facilitate adjacent subsurface parking critical to the economic viability of the commercial development of the site, the reconstruction of the wharf removed or weakened by the construction of the Transitway, the responsibility for environmental clean-up, if any, caused by the MBTA construction, and the related compensation due Boston Edison.

## Response:

As described in the transit project's FEIS/FEIR, the new alignment of the Transitway from Congress Street to the west side of the Fort Point Channel extends beneath Russia Wharf and the southeastern corner of Boston Edison's parcel on Atlantic Avenue. The new alignment does not impact Boston Edison's proposed subsurface parking garage — the Transitway tunnel is fully beneath the garage — and the MBTA is not part of the Chapter 91 license application proposed by Boston Edison for future development of the parcel. The MBTA will continue to coordinate with Boston Edison and the CA/T Project with regard to construction details, schedule, easements, and mitigation at the Boston Edison parcel as design of the Transitway Project is advanced.







City of Boston The Environment Department January 21, 1994

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge St. 20th Floor
Boston, MA 02202

RECEIVED

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MEPA

Lorraine M. Downey Director

THOMAS M. MENINO

Mayor

Attn.: Jollene Dubner, MEPA Unit

RE: EOEA #6826, South Boston Piers Transitway Final Environmental Impact

Statement/Report (FEIS/R), Boston

Boston City Hall/Room 805 Boston, Massachusetts 02201 617/635-4416 or 635-3850

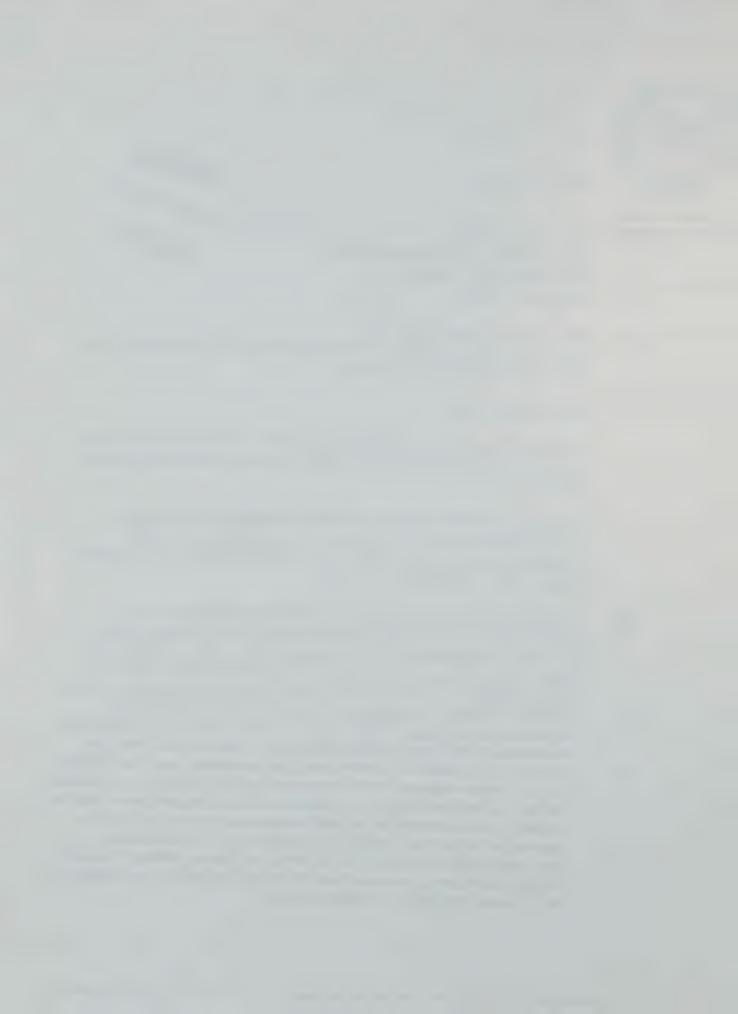
Dear Secretary Coxe:

The City of Boston Environment Department has reviewed the FEIS/R for the proposed project referenced above and hereby submits the following comments in response:

In general, the FEIS/R adequately addresses the issues of concern to the Environment Department. Some issues do remain unresolved, but the Department recommends that the Secretary certify the adequacy of the FEIS/R, subject to the comments below.

The FEIS/R leaves unresolved the fate of the fisheries cooperative. The Environment Department strongly recommends that the MBTA proceed with the taking of this building, and the appropriate relocation of its tenants. The taking of the building would technically involve the dislocation of a Ch. 91 water-dependent use, which the Environment Department would not normally advocate. However, in this case, the relocation makes sense, because the activities in the building are highly sensitive to fugitive dust, and the rather long construction period in the vicinity of the building raises concerns about the viability of the fisheries cooperative during the construction years. The FEIS/R does not address the possibility of construction period disruptions to the fisherie

viability of the fisheries cooperative during the construction years. The FEIS/R does not address the possibility of construction period disruptions to the fisheries building. In addition, the physical condition of the building itself leaves much to be desired, and the tenants receive most fish deliveries by truck, so such close proximity to the fish pier is desirable, but not critical. The Environment Department therefore urges the MBTA to take the fisheries building by eminent domain, and work with the tenants and the Boston Redevelopment Authority to find a suitable alternative site in the piers area.



- The FEIS/R commits the proponent to following City regulations for construction noise. However, the FTA criteria for determining noise impacts for operational noise will govern noise levels after the construction period. The Environment Department has consistently objected to these standards as unfair to urban areas, and has consistently recommended the adoption of a uniform performance standard for residential areas of 65 dBA LDN for transit noise in areas where ambient LDN levels do not reach 65 dBA, and a performance standard of "no exacerbation" in area subject to background noise above 65 dBA LDN. In this case, the project area contains relatively few residences, and the Transitway will follow a primarily underground alignment. Nonetheless, the Environment Department reiterates its objections to current FTA impact criteria.
  - The Response to Comments section does not reprint comment letters in their entirety, but rather presents excepts and responses in a rather random fashion. This creates confusion, and puts the responses out of the appropriate context. It also has lead to some concerns remaining unresolved. In the future, the Response to Comments section should reprint all comments letters in their entirety.
  - The FEIS/R continues to show a bus lane on Congress Street under the TSM alternative. The Environment Department repeats its objections to this design feature. However, the Environment Department hopes that the designation of the full build Transitway as the preferred alternative will make this concern a moot point.
  - The proposed mezzanine at Courthouse Station should help mitigate pedestrian impacts in this area by providing an underpass of the street. However, the MBTA should commit to working with the City on the final design of this station, to ensure that the mezzanine is attractive and inviting. The City wishes to avoid a repeat of the Dartmouth St. underpass, which is dark, uninviting, and feels insecure. The MBTA should also commit to working with the City to find an optimal location for the Courthouse Station headhouses. The Environment Department has some concerns with the impacts of the current Farnsworth St. location on pedestrian circulation and safety. The Environment Department
    - recommends exploring headhouse relocation to either Sleeper or Pittsburgh
      Streets. Both have advantages and drawbacks, but on balance represent superior locations to Farnsworth St.
    - The MBTA should coordinate the construction schedules and phasing for the Boylston Street extension of the Transitway with the Washington Street Replacement Service project. Replacement transit along Washington Street remains a high City priority.



In conclusion, the Environment Department recommends the certification of the FEIS/R. The MBTA should commit to taking the fisheries cooperative, and should commit to resolving the outstanding design issues with the City in good faith.

I thank you for your time and attention.

Fraine Mr. Down

Sincerely,

Lorraine M. Downey

Director

LMD/AP:ap

cc: Andrew Brennan, MBTA Mary Beth Mello, FTA



# City of Boston The Environment Department

#### Comment 20:

The FEIS/R leaves unresolved the fate of the fisheries cooperative. The Environment Department strongly recommends that the MBTA proceed with the taking of this building, and the appropriate relocation of its tenants. The taking of the building would technically involve the dislocation of a Chapter 91 water-dependent use, which the Environment Department would not normally advocate. However, in this case, the relocation makes sense, because the activities in the building are highly sensitive to fugitive dust, and the rather long construction period in the vicinity of the building raises concerns about the viability of the fisheries cooperative during the construction years.

#### Response:

The New England Seafood Center is located on a 4.4-acre parcel at 145 Northern Avenue and is bordered by the East Service Road on the west, B Street on the east, and Congress Street (and the proposed New Congress Street) on the south. The land and building are owned by eight partners of the Massachusetts partnership known as the New England Seafood Center Associates.

The Center consists of a brick and concrete structure containing fish processing and wholesale distribution companies, as well as a nightclub in the northernmost portion of the building. The building contains approximately 85,600 square feet and was built in two sections. The section that fronts on Northern Avenue was constructed in 1954, and the rear portion was constructed in 1970.

The building has loading docks on the east, west, and south sides. Truck access is maintained around the entire building. The non-fish tenant, the nightclub known as "Polly-Estas," also has a loading dock where beverages are handled. All loading docks required for fish processing require refrigeration. The portion of the lot that is not utilized by either the building, access ways, or loading docks is occupied by parking spaces used by employees and occasional visitors. In the evening, the lot is also used by patrons of the nightclub.

Two options have been considered relative to the construction of the Transitway Project through the New England Seafood Center property. These include acquiring the Seafood Center and subsequently demolishing it during construction, or structurally underpinning the building and constructing the Transitway tunnel beneath it. Although the building does not lie within the South Boston Designated Port Area (DPA), it does lie within Chapter 91 jurisdictional boundaries. Acquisition and demolition of the building would therefore require the relocation of all tenants. Additionally, building demolition would result in an expansion of the anticipated area of construction-related disruption and an increase in the project-related volume of demolition wastes. Underpinning would not require the relocation of tenants and would avoid the associated impacts of building demolition.

Upon completion of the project's FEIS/FEIR, the MBTA further investigated the two options for the New England Seafood Center, working closely with agencies such as the Massachusetts Port Authority (Massport), Massachusetts Highway Department (MHD) and the CA/T Project, Boston Transportation Department (BTD), Boston Redevelopment Authority (BRA), and Economic Development and Industrial Corporation (EDIC), as well as with the Seafood Center owners and occupants.



Issues regarding future land uses, roadway improvements, construction schedules, and costs were discussed and evaluated. Since this coordination effort did not result in an acquisition plan that was acceptable to all parties, the MBTA proposes to underpin, rather than acquire, the New England Seafood Center. Underpinning, which will not require the relocation of Seafood Center tenants, is technically feasible and is less expensive than an acquisition.

The MBTA recognizes that construction of the Transitway tunnel through the New England Seafood Center property will require coordination with a number of parties, including area property owners, adjacent businesses, and nearby construction projects. A conceptual design for the proposed underpinning of the Seafood Center consists of jacking pipepiles under the existing foundation and constructing steel framing for support of the building. This method requires jacking and receiving pits on the east and west sides of the building, which must be accessible to the surface. All other work will occur underground and will have little or no effect on the structure during and upon completion of construction. During construction, access to the jacking and receiving pits will require close coordination with the Seafood Center tenants to ensure adequate loading dock space, access around the site, maintenance of power for refrigeration, and parking. Any potential disruption of operations during MBTA construction will require mitigation by the MBTA. The MBTA will work with tenants of the Seafood Center, the CA/T Project, and other adjacent projects as the underpinning scheme is designed to further identify impacts and mitigation. Maintenance of traffic plans during underpinning of the Seafood Center by the MBTA will consider such mitigation measures as accommodation of Center truck traffic in adjacent streets, construction during nighttime hours, off-site parking, and loading area reconfiguration. These maintenance of traffic plans will be coordinated with any plans approved for the CA/T Project.

#### Comment 21:

The FEIS/R does not address the possibility of construction period disruptions to the fisheries building. In addition, the physical condition of the building itself leaves much to be desired, and the tenants receive most fish deliveries by truck, so such close proximity to the fish pier is desirable, but not critical. The Environment Department, therefore, urges the MBTA to take the fisheries building by eminent domain, and work with the tenants and the Boston Redevelopment Authority to find a suitable alternative site in the piers area.

## Response:

As described above in the response to the previous comment, the MBTA will underpin, rather than acquire, the New England Seafood Center. The MBTA will work with tenants of the Seafood Center as the underpinning scheme is designed to further identify construction period impacts and mitigation.

#### Comment 22:

The FEIS/R commits the proponent to following City regulations for construction noise. However, the FTA criteria for determining noise impacts for operational noise will govern noise levels after the construction period. The Environment Department has consistently objected to these standards as unfair to urban areas, and has consistently recommended the adoption of a uniform performance standard for residential areas of 65dBA  $L_{\rm DN}$  for transit noise in areas where ambient  $L_{\rm DN}$  levels do not reach 65 dBA, and a performance standard of "no exacerbation" in areas subject to background noise above 65 dBA  $L_{\rm DN}$ . In this case, the project area contains relatively few residences, and the Transitway will follow a primarily underground alignment. Nonetheless, the Environment Department reiterates its objections to current FTA impact criteria.

## Response:

As the Environment Department is aware, the MBTA is obligated by National Environmental Policy Act (NEPA) regulations to prepare its noise analysis in accordance with



guidance provided by the Federal Transit Administration (FTA). While the MBTA recognizes the Department's concerns with these noise criteria, the Transitway involves operation of rubber-tired vehicles in an underground tunnel, and operational noise is not expected to become an issue.

The MBTA is in the process of developing a new noise policy aimed at directing the Authority's approach to identifying and mitigating noise problems. This policy will replace the reactive, situation-by-situation approach previously used by the MBTA to respond to complaints about noise related to the delivery or construction of transit services. Highlights of the policy which will govern construction noise, as well as the monitoring of operational noise associated with the Transitway include the following.

- A noise consultant will be hired to establish MBTA systemwide preliminary criteria and standards which are compatible with existing state and federal regulations and industry standards.
- Up to 2 percent of the construction budget will be dedicated to noise mitigation for new construction projects.
- For each project, a survey will be conducted to identify and assess operational and construction noise concerns in accordance with the criteria.
- The consultant will rank problem areas based on severity, recommend a range of mitigation remedies, and estimate the costs associated with potential mitigation remedies.
- Recommended remedies will be proposed to the General Manager by MBTA project staff.

Monitoring of Transitway operational noise will be governed by the MBTA's proposed new noise policy. A monitoring program could consist of periodic (once or twice a year) measurements of noise levels at sensitive receptor locations in the vicinity of Transitway operations.

#### Comment 23:

The Response to Comments section does not reprint comment letters in their entirety, but rather presents excerpts and responses in a rather random fashion. This creates confusion, and puts the responses out of the appropriate context. It also has lead to some concerns remaining unresolved. In the future, the Response to Comments section should reprint all comments letters in their entirety.

#### Response:

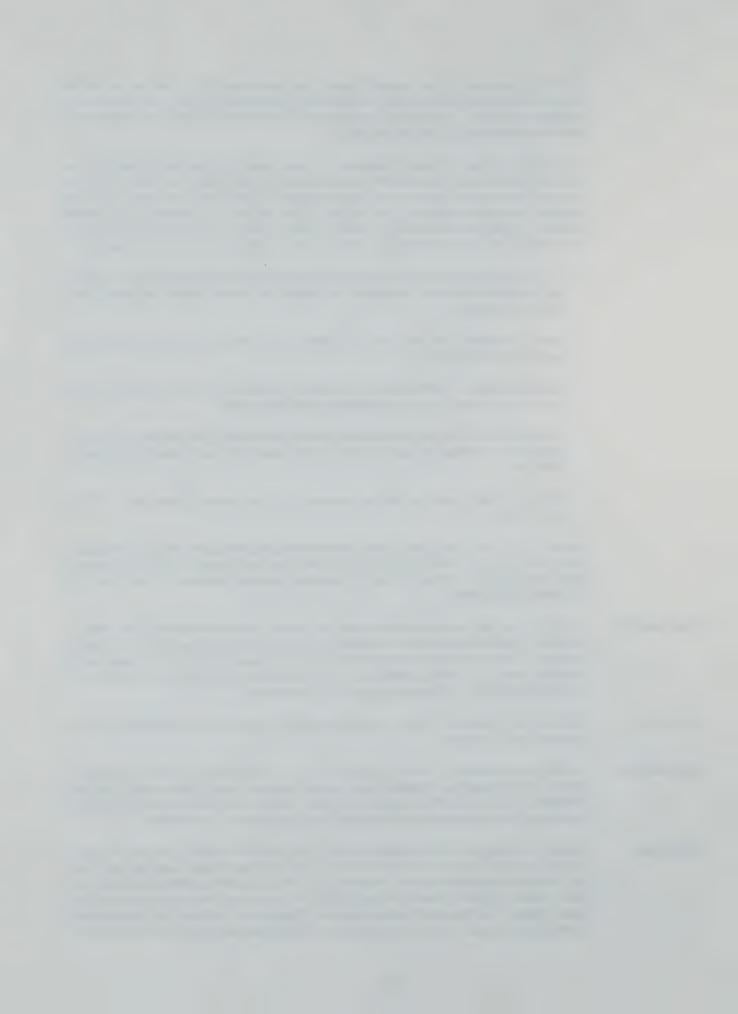
In this Draft Section 61 Finding, comment letters received on the FEIS/FEIR are reprinted in their entirety.

#### Comment 24:

The FEIS/R continues to show a bus lane on Congress Street under the TSM alternative. The Environment Department repeats its objections to this design feature. However, the Environment Department hopes that the designation of the full build Transitway as the preferred alternative will make this concern a moot point.

## Response:

The MBTA recognizes the undesirability of a bus lane on New Congress Street; indeed, this was one of the reasons that the Bus/TSM Alternative was rejected. The bus lane continued to be shown in the FEIS/FEIR since it was deemed necessary as part of the Bus/TSM Alternative to balance the high demand for transit services in the South Boston Piers area with traffic concerns. Rejection of the Bus/TSM Alternative in favor of the full build Transitway as the preferred alternative eliminates the need for a



bus lane on New Congress Street. The MBTA's Transitway does not include a bus lane on New Congress Street.

#### Comment 25:

The proposed mezzanine at Courthouse Station should help mitigate pedestrian impacts in this area by providing an underpass of the street. However, the MBTA should commit to working with the City on the final design of this station, to ensure that the mezzanine is attractive and inviting. The City wishes to avoid a repeat of the Dartmouth Street underpass, which is dark, uninviting, and feels insecure. The MBTA should also commit to working with the City to find an optimal location for the Courthouse Station headhouses.

## Response:

The MBTA will coordinate with the City as design of the mezzanine and pedestrian passageway at Courthouse Station is advanced. As currently proposed, the passageway will be well lit and protected by plexiglass partitions, enabling station personnel to monitor activity from the mezzanine level. The station is currently at the schematic design level, and it is expected that additional concepts that enhance pedestrian safety and security will be incorporated into the station design. The MBTA welcomes the input of the City in developing these additional safety and security concepts.

The headhouse locations for Courthouse Station will remain as proposed in the transit project's FEIS/FEIR; that is, on both sides of New Northern Avenue in the vicinity of Farnsworth Street, and at the southeastern corner of New Northern Avenue and Pittsburgh Street. The MBTA believes that these headhouses are well-located to serve existing and future development in the Piers area. The rationale for siting of Courthouse Station is described in greater detail in the following response to Comment 26.

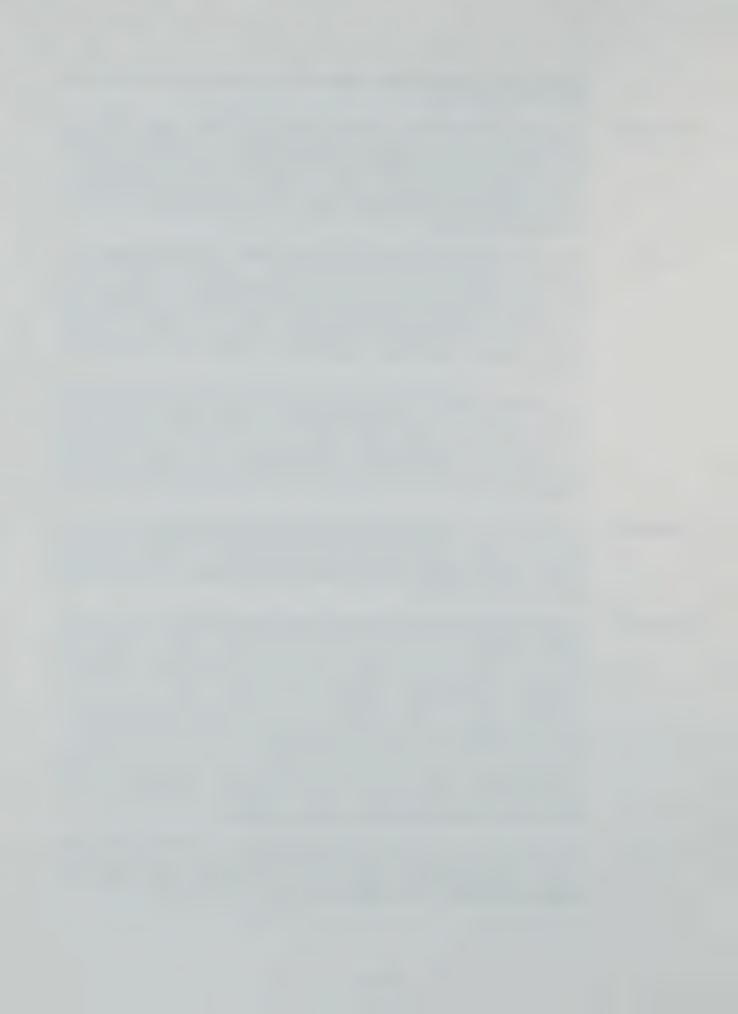
#### Comment 26:

The Environment Department has some concerns with the impacts of the current Farnsworth Street location on pedestrian circulation and safety. The Environment Department recommends exploring headhouse relocation to either Sleeper or Pittsburgh Streets. Both have advantages and drawbacks, but on balance represent superior locations to Farnsworth Street.

## Response:

The MBTA has met with public agencies, including the BTD, BRA, MHD, and the General Services Administration, and private interests, such as the McCourt-Broderick Limited Partnership and the Children's Museum, to address concerns about Courthouse Station as documented in comment letters submitted on the project's FEIS/FEIR. Issues discussed with these public and private interests include safety, pedestrian access, and future development in the Piers area. After consideration of the various concerns and competing interests identified and discussed in these meetings, the MBTA has determined that the location of the Courthouse Station, including the headhouses as proposed in the FEIS/FEIR, is appropriate, and should not be changed. However, other mitigation measures to address concerns expressed during meetings with public and private interests will be implemented. These measures are discussed later in this section, following a brief description of the rationale for the proposed Courthouse Station siting decision.

The two Piers area Transitway stations — Courthouse and World Trade Center Stations — were sited to provide maximum transit coverage of the area. These stations were sited by the MBTA with input from state and city planners, including the BRA and Massport, as well as from Piers area property owners and developers.



Alternative locations for Courthouse Station at Sleeper and Pittsburgh Streets were considered during station siting. Neither of these locations is as advantageous as the proposed Farnsworth Street location. Of primary importance is that the Courthouse Station be as close as possible to the new Federal Courthouse. The proposed Farnsworth Street location is directly opposite (although a block away from) the main entrance of the Courthouse. Although a Courthouse Station shifted west to Sleeper Street would be dramatically sited on the waterfront, engineering for such a shift is not feasible for a number of reasons.

Specifically, the proposed Courthouse Station platforms are located on a tangent (i.e., straight) section. Moving the station west would place the platforms on a curve. Since a tangent section is required for station platforms, the Transitway alignment west of Sleeper Street would need to be redesigned. Such a realignment is not feasible, however, since it would result in an adverse impact to the abutment of the New Northern Avenue Bridge. Alternatively, the current proposed platform location could be maintained, and the headhouses relocated to Sleeper Street. This extension of the accessways to Courthouse Station would result in a much larger and more costly station. Furthermore, the construction of the New Northern Avenue Bridge immediately adjacent to Sleeper Street headhouses would pose safety problems for transit passengers entering or exiting the station. Cars coming off the incline of the New Northern Avenue Bridge will reach grade at the intersection of Sleeper Street and New Northern Avenue. As cars come down the incline, they are likely to be accelerating. Similarly, as motorists approach the bridge incline, their natural instinct would be to accelerate. The safety of Transitway station users and other pedestrians could be jeopardized by the six lanes of accelerating traffic and motorists with poor sight lines at the intersection of Sleeper Street and New Northern Avenue.

A station location at Pittsburgh Street would be located too far from the Federal Courthouse, existing development along the western edge of the Fort Point Channel, and a potential future water shuttle terminal at Fan Pier. It is desirable from both wayfinding and urban design perspectives that the headhouses be as close as possible to, and visible from, the channel and the Fan Pier. Along with the future Federal Courthouse, these are two of the Piers area's strongest geographical features.

The Courthouse Station location at the western edge of the Piers area was chosen specifically to serve existing developments, including Museum Wharf (consisting of the Children's Museum, Computer Museum, and Boston Tea Party Ship Museum) and the Boston Wharf Company. Approximately one-third of existing development in the Piers area is focused there. This development consists primarily of office uses, which generate a high level of trip demand per square foot of development.

A one-quarter mile walk radius was used to analyze station locations with respect to their ability to serve area development. To avoid overlap of these radii and maximize the cost-effectiveness of the project, the two stations were spaced roughly one-half mile apart. The northwest entrance to Courthouse Station is located across from the new Federal Courthouse at Fan Pier (within a two-minute walk distance), and a southwest entrance provides access to the Boston Wharf Company buildings and to Museum Wharf. Using a one-quarter mile walk distance, Courthouse Station will also serve developments in the easternmost portion of the Financial District, including International Place.

In their comments on the Transitway's Draft Environmental Impact Report, officials from the Computer Museum stressed that the Courthouse Station should remain as close to Museum Wharf as possible. Museum Wharf currently attracts over a million



visitors each year, and museum directors believe that convenient, accessible transit is likely to capture a considerable portion of these visitors and Museum staff if the service meets their needs. Needs include a short walk distance from the Transitway station, and easily accessible vehicles that can accommodate strollers, baby carriages, and wheelchairs. Future transportation developments, such as water shuttle services expected to dock at Fan Pier, and the existing Northern Avenue Bridge, which is proposed for conversion as an enhanced pedestrian walkway, would also be well-served by station headhouses in the vicinity of Farnsworth Street.

Based on these factors, the MBTA believes that the Piers area would be ill-served by a relocation of Courthouse Station. While the MBTA recognizes that pedestrian safety is of paramount concern given the midblock location of station headhouses in the vicinity of Farnsworth Street, such headhouse locations have been successful elsewhere in the MBTA system. For example, the Kendall and Kenmore Stations are at mid-block locations. Easy access to these stations is achieved in several ways. At Kenmore Station, headhouses on either side of Commonwealth Avenue lead to a mezzanine, while passengers accessing Kendall Station are eased across the highly defined mid-block crossing by flags set into the median of Main Street in Cambridge and a pedestrian actuated signal.

As described in the FEIS/FEIR, Courthouse Station will be designed with a mezzanine accessible from both sides of New Northern Avenue. Other mitigation measures that the MBTA commits to implement with approval from such agencies as the BTD include the following:

- Courthouse Station entrance/exit at Pittsburgh Street. The headhouse located at the southeastern corner of New Northern Avenue and Pittsburgh Street will be open as a Courthouse Station entrance/exit. Previously, this headhouse was designated as an emergency exit only, with the main station entrance/exit headhouses located on both sides of New Northern Avenue in the vicinity of Farnsworth Street. The designation of all three headhouses for station entrance/exit will improve pedestrian circulation at Courthouse Station, and will now allow pedestrians to access the station at the New Northern Avenue/Pittsburgh Street signalized intersection.
- Installation of a barrier. A fence or other barrier along the New Northern Avenue median would prevent mid-block crossings. The current median plan for New Northern Avenue does not provide for any such barrier. The MBTA will work with other agencies, such as the BRA, on the final landscaping plan for the New Northern Avenue median. In combination with a median barrier, a pedestrian actuated signal could be installed at the midblock headhouse location. A change in the color and material of the crossing could also be provided to alert motorists that this is a pedestrian crossing. At a minimum, the crosswalk striping here should be very wide so motorists have a strong visual cue that crossings may occur.
- Clear signage and graphics. Provision of clear signage and graphics both at the station level underground and at the street level will greatly facilitate communication with pedestrians. Prominent below level signage will direct exiting passengers to the appropriate side of New Northern Avenue so they can reach their destinations without crossing the street at the surface. Headhouses at street level will be marked by a strong and highly visible design. It is also the intention of the MBTA to have a community relations person in the station to answer questions and direct station users to destinations in the Piers area.

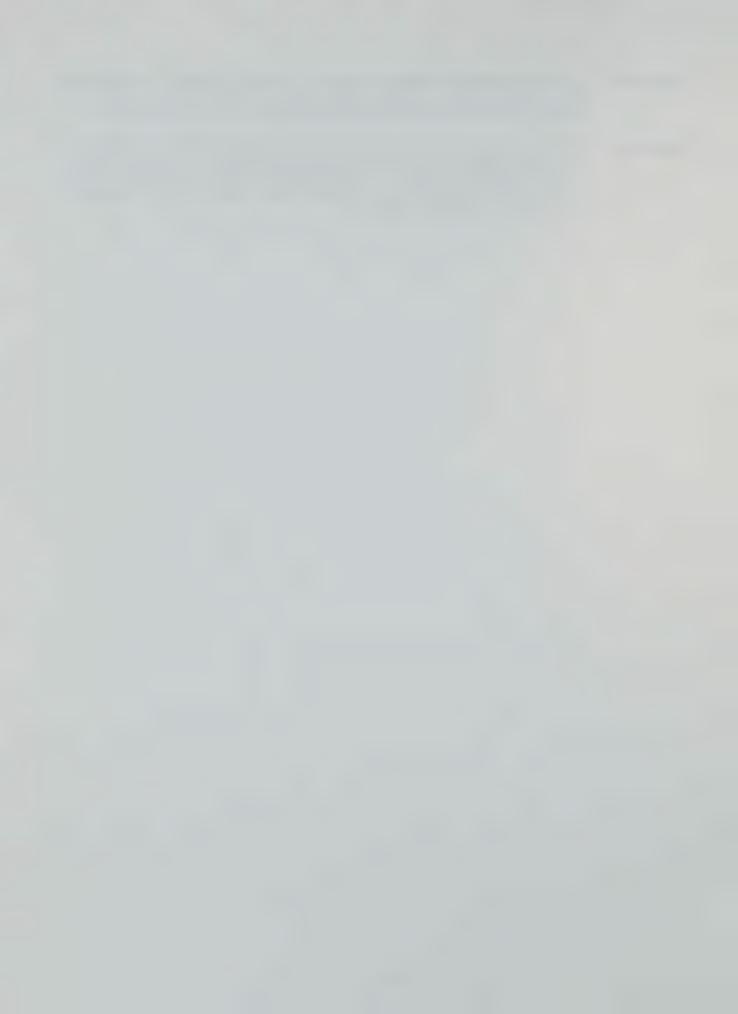


Comment 27:

The MBTA should coordinate the construction schedules and phasing for the Boylston Street extension of the Transitway with the Washington Street Replacement Transit Project. Replacement transit along Washington Street remains a high City priority.

Response:

Given the potential for a future operational connection between the two transit services, further planning, design, and phasing of the full build Transitway will continue to be coordinated with plans for the Washington Street Replacement Transit Project. Currently, the Transitway station and tunnel at Boylston Station are being designed to permit this future operational connection.



## Boston Redevelopment Authority

Clarence J. Jones, Chairman
Paul L. Barrett, Director

January 26, 1994

Ms. Mary Beth Mello
Deputy Regional Administrator
U.S. Department of Transportation
Federal Highway Administration - Region I
55 Broadway
Cambridge, MA 02142

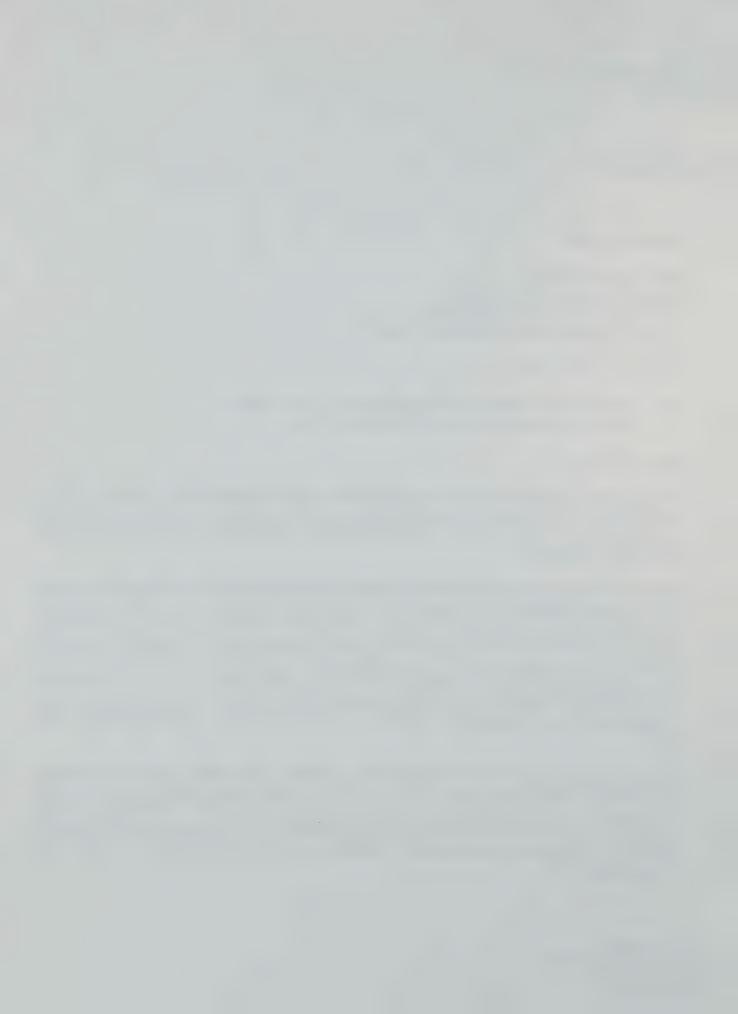
RE: South Boston Piers/Fort Point Channel Transit Project: Final Environmental Impact Statement/Report

Dear Ms. Mello:

Pursuant to regulations implementing the National Environmental Policy Act (42 U.S.C. 4332 (2) (c) 77), the Boston Redevelopment Authority (BRA) has reviewed the above referenced Final Environmental Impact Statement/Report and wishes to submit the following comments.

The Boston Redevelopment Authority enthusiastically supports the full build alternative for the Massachusetts Bay Transportation Authority (MBTA) South Boston Piers/Fort Point Channel Transit Project. Over the course of an extensive community planning process the Fort Point District of South Boston was identified for significant economic growth in the coming decade. The resulting plan and zoning adopted by the City for the area bases future levels of development on the transportation access to be provided by the Seaport Access Road interchange and the capacity of the Transitway. The completion of the Transitway is, therefore, integrally tied to the economic future of the area.

Today the development future is beginning to unfold. Two major projects are already proceeding toward construction. The Federal Courthouse is scheduled to break ground next year and the World Trade Center Hotel in the fall of 1994. The Seaport Access Road construction is also underway and upon opening will dramatically spur economic growth. It is therefore critical that the Transitway project move forward to support this economic growth.



It is also important that the South Boston portion of the project proceed in a timely way. we have no doubt that significant cost savings can accrue to the MBTA as well as the Central Artery/Tunnel Project if such parallel construction is undertaken. Furthermore, a co-ordinated effort can minimize disruption to residents, businesses, and commuters.

- From this perspective we urge the FTA/MBTA to select the alternative which provides for the taking of the New England Seafood Center. We are concerned that the magnitude of construction contemplated by the MBTA can easily disrupt the operation of the fisheries' business, severely restrict truck access to the site, and cause irreparable hardship. On the other hand, a well thought through relocation plan can insure the continued viability of these businesses as well as promoting the community-based plan for the area's redevelopment. Accordingly, we urge the MBTA to work with other agencies in securing such an outcome. Further, the BRA is available to assist in resolving this issue in an expeditious fashion.
- It is also important that planning for the portion of the project between South Station and Boylston Station be closely coordinated with evolving development plans in the midtown area of Boston. Carefully coordinated station locations and designs as well as tunnel alignments will ensure that the new economic investments now emerging in the area will be well supported by transit and that no conflicts between MBTA and development plans occur.
- The design of the catenary system for the surface portion of the project in the eastern section of South Boston will require special considerations. Within the Boston Marine Industrial Park, the catenary must be designed so as not to inhibit the movement of heavy industrial equipment, such as cranes, which are necessary for the operation of the Park. The proposed design should be reviewed with the City's Economic Development and Industrial Commission (EDIC) to ensure the minimization of any conflict. Secondly, the Full Build will include the extension of the catenary into the South Boston residential community, following the current routing of Bus #7 to City Point. The design of the catenary system here must be particularly sensitive to the residential character of these neighborhoods and should be reviewed with the BRA prior to construction.
- Another issue is the proposed mid-block location of the Courthouse Station. Even with the proposed underground mezzanine, there is still the potential that many people will cross New Northern Avenue at mid-block to access the Federal Courthouse. This presents public safety, as well as convenience, issues which need to be resolved. As an alternative, we recommend that the MBTA give serious consideration to using the Pittsburgh Street headhouses as the primary access to the station or relocating the Courthouse Station headhouses to the Sleeper Street intersection, which would place the headhouses at a street corner. The Sleeper Street location could also be more convenient to any future water shuttle stop in the Fort Point Channel/Fan Pier area.



- One concern of the City and the BRA that has not been adequately addressed is the issue of angle parking along New Congress Street in order to provide a bus lane while preserving on-street parking in the Bus/TSM alternative. While we recognize that the Bus/TSM alternative is not the selected option for the project, we find that the fact that the description of this alternative still includes angle parking, in spite of our serious objections on the grounds of the potential traffic hazards that would result, is not an acceptable response. In addition, we must reiterate that the proposal to create angle parking at the median of New Congress Street is contrary to our urban design goals for this boulevard and would hinder the success for major new development.
- With respect to excavate disposal requirements, it is noted that the Full Build project would generate an estimated 637,500 cubic yards of excavate material. The majority of this excavate would not be suitable for ocean disposal or project reuse and thus would require landfill disposal. Landfill capacities and competing demands, principally the Central Artery/Tunnel (CA/T) project, were then evaluated. The CA/T project is estimated to generate over 4,700,000 cubic yards of landfill excavate during this same period. The FEIS/R concluded that there would be sufficient in-state capacity to accommodate these requirements. However, this analysis fails to consider another major demand on landfill capacity in the coming years the Boston Harbor Dredging Project, which is estimated to generate approximately 2.9 million cubic yards of dredge material, of which some 274,000 cubic yards would not be suitable for ocean disposal. This requirement also needs to be taken into account in determining the adequacy of landfill capacity for the Transitway project.
- Both the modified sunken tube and the cofferdam methodologies under consideration for the crossing of the Fort Point Channel would require that approximately one-half of the Channel be blocked to permit construction of the tubes. Yet the FEIS/R indicates that there would be temporary changes in tidal current velocities in the vicinity of the cofferdam with this method but that the modified sunken tube method would have virtually no impact on tidal velocity. Since in both instances the same area of channel would be blocked, the different impact on tidal velocities should be explained.
- It is noted that available Federal (ISTEA) funding will cover only 64% of the first phase of the Transitway project, not 80% as originally anticipated. No Federal assistance is as yet available for the second phase of the project. The MBTA indicates that it intends to request additional funds in the proposed ISTEA technical corrections bill in 1994 and through subsequent authorization acts for Phase 2. We support the MBTA in this endeavor and encourage them to seek these funds as expeditiously as possible. Further, the FEIS/R indicated that if additional Federal funds are not forthcoming, then the implementation schedule would need to be extended until new sources of funding were identified. The specific meaning of this is unclear. Would the MBTA only construct a reduced Phase 1 project (e.g., MOS-1)? The City would not support a limited project such as MOS-1 since we believe it would severely hinder development opportunities in the Fan Pier and Commonwealth Flats areas. Therefore, should additional Federal funds



not be available, then the MBTA must pursue alternative funding sources to ensure the implementation of this critical transit project.

- At Boston Common, construction of the Boylston Transitway Station is expected to temporarily restrict pedestrian circulation and, according to current MBTA plans, to require the temporary taking of a portion of Lafayette Mall for a traffic detour lane. The BRA has serious concerns with this proposal and considers it to be an unresolved issue. To mitigate any construction-related impacts to the Common, we recommend that it would be appropriate for the MBTA to assist financially in the implementation of the Boston Common Management Plan. In addition, we request that New Northern Avenue, which is currently under construction, be restored by the MBTA to its condition prior to the initiation of the Transitway work.
- Finally, we note that the <u>Response to Comments Appendix</u> only quoted excerpts from the comment letters and did not include the comment letters themselves. We do not find this to be appropriate or acceptable for reviewers, as the context in which comments are made can be just as important as the comment itself. Further, one cannot tell whether all comments have been addressed if the letters themselves are not included (for example, several important comments in the City's Transportation Department letter on the DEIS/SDEIR were not responded to).

In closing we would like to express our firm conviction that the South Boston Piers/Fort Point Channel Transitway is just the sort of project people have in mind when they speak of the beneficial link between public infrastructure investment and private sector growth and development. We look forward to the speedy implementation of this important and vital transportation project.

Paul Reavis

Sincerely,

Assistant Director for

Engineering and Design Services

cc: Nancy T. Polcari, MBTA Andrew Brennan, MBTA Donald J. Emerson, FTA



# **Boston Redevelopment Authority**

#### Comment 28:

We urge the FTA/MBTA to select the alternative which provides for the taking of the New England Seafood Center. We are concerned that the magnitude of construction contemplated by the MBTA can easily disrupt the operation of the fisheries' business, severely restrict truck access to the site, and cause irreparable hardship. On the other hand, a well thought through relocation plan can insure the continued viability of these businesses, as well as promoting the community-based plan for the area's redevelopment. Accordingly, we urge the MBTA to work with other agencies in securing such an outcome. Further, the BRA is available to assist in resolving this issue in an expeditious fashion.

#### Response:

The New England Seafood Center is located on a 4.4-acre parcel at 145 Northern Avenue and is bordered by the East Service Road on the west, B Street on the east, and Congress Street (and the proposed New Congress Street) on the south. The land and building are owned by eight partners of the Massachusetts partnership known as the New England Seafood Center Associates.

The Center consists of a brick and concrete structure containing fish processing and wholesale distribution companies, as well as a nightclub in the northernmost portion of the building. The building contains approximately 85,600 square feet and was built in two sections. The section that fronts on Northern Avenue was constructed in 1954, and the rear portion was constructed in 1970.

The building has loading docks on the east, west, and south sides. Truck access is maintained around the entire building. The non-fish tenant, the nightclub known as "Polly-Estas," also has a loading dock where beverages are handled. All loading docks required for fish processing require refrigeration. The portion of the lot that is not utilized by either the building, access ways, or loading docks is occupied by parking spaces used by employees and occasional visitors. In the evening, the lot is also used by patrons of the nightclub.

Two options have been considered relative to the construction of the Transitway Project through the New England Seafood Center property. These include acquiring the Seafood Center and subsequently demolishing it during construction, or structurally underpinning the building and constructing the Transitway tunnel beneath it. Although the building does not lie within the South Boston Designated Port Area (DPA), it does lie within Chapter 91 jurisdictional boundaries. Acquisition and demolition of the building would therefore require the relocation of all tenants. Additionally, building demolition would result in an expansion of the anticipated area of construction-related disruption and an increase in the project-related volume of demolition wastes. Underpinning would not require the relocation of tenants and would avoid the associated impacts of building demolition.

Upon completion of the project's FEIS/FEIR, the MBTA further investigated the two options for the New England Seafood Center, working closely with agencies such as the Massachusetts Port Authority (Massport), Massachusetts Highway Department (MHD) and the CA/T Project, Boston Transportation Department (BTD), Boston Redevelopment Authority (BRA), and Economic Development and Industrial Corporation (EDIC), as well as with the Seafood Center owners and occupants. Issues regarding future land uses, roadway improvements, construction schedules, and costs were discussed and evaluated. Since this coordination effort did not result



in an acquisition plan that was acceptable to all parties, the MBTA proposes to underpin, rather than acquire, the New England Seafood Center. Underpinning, which will not require the relocation of Seafood Center tenants, is technically feasible and is less expensive than an acquisition.

The MBTA recognizes that construction of the Transitway tunnel through the New England Seafood Center property will require coordination with a number of parties, including area property owners, adjacent businesses, and nearby construction projects. A conceptual design for the proposed underpinning of the Seafood Center consists of jacking pipepiles under the existing foundation and constructing steel framing for support of the building. This method requires jacking and receiving pits on the east and west sides of the building, which must be accessible to the surface. All other work will occur underground and will have little or no effect on the structure during and upon completion of construction. During construction, access to the jacking and receiving pits will require close coordination with the Seafood Center tenants to ensure adequate loading dock space, access around the site, maintenance of power for refrigeration, and parking. Any potential disruption of operations during MBTA construction will require mitigation by the MBTA. The MBTA will work with tenants of the Seafood Center, the CAT Project, and other adjacent projects as the underpinning scheme is designed to further identify impacts and mitigation. Maintenance of traffic plans during underpinning of the Seafood Center by the MBTA will consider such mitigation measures as accommodation of Center truck traffic in adjacent streets, construction during nighttime hours, off-site parking, and loading area reconfiguration. These maintenance of traffic plans will be coordinated with any plans approved for the CA/T Project.

#### Comment 29:

It is also important that planning for the portion of the project between South Station and Boylston Station be closely coordinated with evolving development plans in the midtown area of Boston. Carefully coordinated station locations and designs, as well as tunnel alignments will ensure that the new economic investments now emerging in the area will be well supported by transit and that no conflicts between MBTA and development plans occur.

#### Response:

The MBTA agrees that design of the full build Transitway between South Station and Boylston Station must be carefully coordinated with emerging development plans in Boston's midtown. As in the Piers area, the opportunity exists to jointly plan and encourage a symbiotic relationship between the new transit service and future development in midtown. The MBTA will continue to coordinate with the BRA and future developers as design of the Transitway midtown section is advanced. Similarly, future development plans for midtown must consider and accommodate Transitway right-of-way and future station locations.

#### Comment 30:

The design of the catenary system for the surface portion of the project in the eastern section of South Boston will require special considerations. Within the Boston Marine Industrial Park, the catenary must be designed so as not to inhibit the movement of heavy industrial equipment, such as cranes, which are necessary for the operation of the Park. The proposed design should be reviewed with the City's Economic Development and Industrial Commission (EDIC) to ensure the minimization of any conflict.

#### Response:

The Transitway's surface catenary system will be designed in conjunction with other streetscape elements in the South Boston Piers area. The MBTA is currently working with the South Boston Streetscape Committee which has been convened to develop a design for the Piers area's streetscape; committee members include representatives from the City of Boston, Massport, and CA/T Project. The MBTA will integrate design



of the catenary system associated with surface operation of Transitway trackless trolley vehicles with the area's streetscape elements, including lighting, trees, and signage. This integration will ensure compatibility and cohesion of the area's streetscape.

Design specifications for the Transitway catenary system will be established to accommodate the operation of trucks and heavy equipment on surface streets. The special requirements of the Boston Marine Industrial Park (BMIP), which involve the operation of cranes and other heavy equipment associated with maritime industries, will require particular attention as design specifications are developed. The MBTA will coordinate with EDIC both on development of catenary specifications and on final design of the surface catenary system.

#### Comment 31:

Secondly, the Full Build will include the extension of the catenary into the South Boston residential community, following the current routing of Bus No. 7 to City Point. The design of the catenary system here must be particularly sensitive to the residential character of these neighborhoods and should be reviewed with the BRA prior to construction.

#### Response:

Extension of Transitway service into residential South Boston, scheduled for the year 2008, will require sensitive design solutions to integrate overhead catenary elements into the area's streetscape. Catenary on South Boston neighborhood streets will be designed to be consistent with the scale and residential character of the area; this design will be reviewed by the BRA prior to construction. However, the potential exists that an alternative, non-catenary, propulsion system may be available for revenue service on this residential South Boston route by 2008. The MBTA will evaluate any appropriate new technology as design on this segment of the Transitway is advanced.

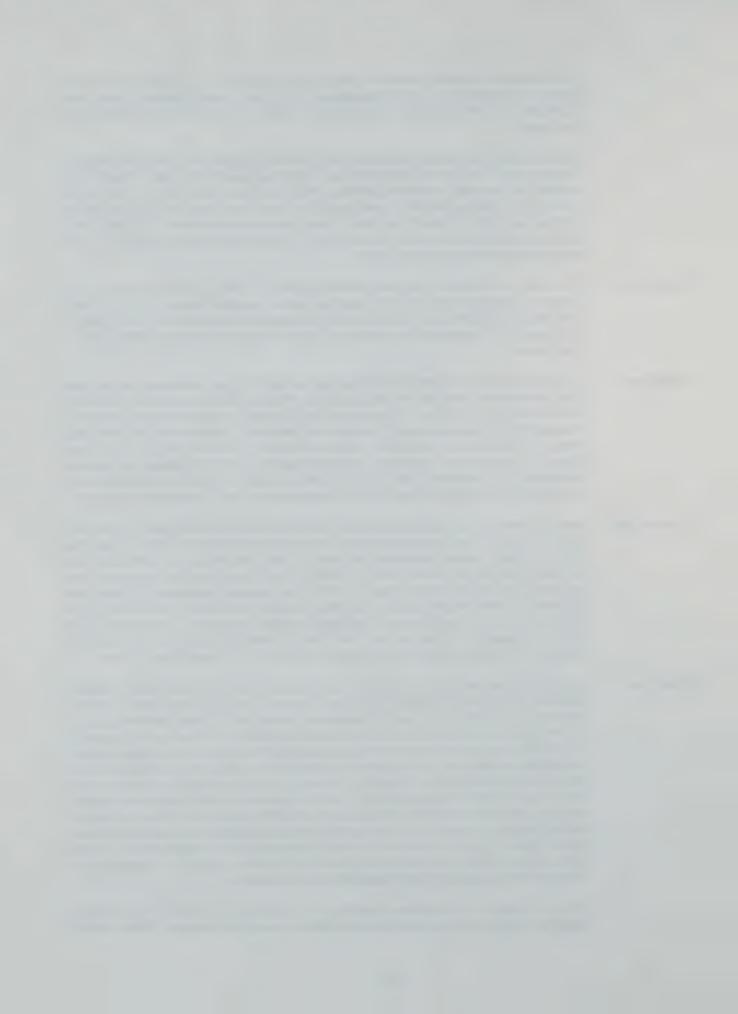
#### Comment 32:

Another issue is the proposed mid-block location of the Courthouse Station. Even with the proposed underground mezzanine, there is still the potential that many people will cross New Northern Avenue at mid-block to access the Federal Courthouse. This presents public safety, as well as convenience, issues which need to be resolved. As an alternative, we recommend that the MBTA give serious consideration to using the Pittsburgh Street headhouses as the primary access to the station or relocating the Courthouse Station headhouses to the Sleeper Street intersection, which would place the headhouses at a street corner. The Sleeper Street location could also be more convenient to any future water shuttle stop in the Fort Point Channel/Fan Pier area.

#### Response:

The MBTA has met with public agencies, including the BTD, BRA, MHD, and the General Services Administration, and private interests, such as the McCourt-Broderick Limited Partnership and the Children's Museum, to address concerns about Courthouse Station as documented in comment letters submitted on the project's FEIS/FEIR. Issues discussed with these public and private interests include safety, pedestrian access, and future development in the Piers area. After consideration of the various concerns and competing interests identified and discussed in these meetings, the MBTA has determined that the location of the Courthouse Station, including the headhouses as proposed in the FEIS/FEIR, is appropriate, and should not be changed. However, other mitigation measures to address concerns expressed during meetings with public and private interests will be implemented. These measures are discussed later in this section, following a brief description of the rationale for the proposed Courthouse Station siting decision.

The two Piers area Transitway stations – Courthouse and World Trade Center Stations – were sited to provide maximum transit coverage of the area. These stations



were sited by the MBTA with input from state and city planners, including the BRA and Massport, as well as from Piers area property owners and developers.

Alternative locations for Courthouse Station at Sleeper and Pittsburgh Streets were considered during station siting. Neither of these locations is as advantageous as the proposed Farnsworth Street location. Of primary importance is that the Courthouse Station be as close as possible to the new Federal Courthouse. The proposed Farnsworth Street location is directly opposite (although a block away from) the main entrance of the Courthouse. Although a Courthouse Station shifted west to Sleeper Street would be dramatically sited on the waterfront, engineering for such a shift is not feasible for a number of reasons.

Specifically, the proposed Courthouse Station platforms are located on a tangent (i.e., straight) section. Moving the station west would place the platforms on a curve. Since a tangent section is required for station platforms, the Transitway alignment west of Sleeper Street would need to be redesigned. Such a realignment is not feasible, however, since it would result in an adverse impact to the abutment of the New Northern Avenue Bridge. Alternatively, the current proposed platform location could be maintained, and the headhouses relocated to Sleeper Street. This extension of the accessways to Courthouse Station would result in a much larger and more costly station. Furthermore, the construction of the New Northern Avenue Bridge immediately adjacent to Sleeper Street headhouses would pose safety problems for transit passengers entering or exiting the station. Cars coming off the incline of the New Northern Avenue Bridge will reach grade at the intersection of Sleeper Street and New Northern Avenue. As cars come down the incline, they are likely to be accelerating. Similarly, as motorists approach the bridge incline, their natural instinct would be to accelerate. The safety of Transitway station users and other pedestrians could be jeopardized by the six lanes of accelerating traffic and motorists with poor sight lines at the intersection of Sleeper Street and New Northern Avenue.

A station location at Pittsburgh Street would be located too far from the Federal Courthouse, existing development along the western edge of the Fort Point Channel, and a potential future water shuttle terminal at Fan Pier. It is desirable from both wayfinding and urban design perspectives that the headhouses be as close as possible to, and visible from, the channel and the Fan Pier. Along with the future Federal Courthouse, these are two of the Piers area's strongest geographical features.

The Courthouse Station location at the western edge of the Piers area was chosen specifically to serve existing developments, including Museum Wharf (consisting of the Children's Museum, Computer Museum, and Boston Tea Party Ship Museum) and the Boston Wharf Company. Approximately one-third of existing development in the Piers area is focused there. This development consists primarily of office uses, which generate a high level of trip demand per square foot of development.

A one-quarter mile walk radius was used to analyze station locations with respect to their ability to serve area development. To avoid overlap of these radii and maximize the cost-effectiveness of the project, the two stations were spaced roughly one-half mile apart. The northwest entrance to Courthouse Station is located across from the new Federal Courthouse at Fan Pier (within a two-minute walk distance), and a southwest entrance provides access to the Boston Wharf Company buildings and to Museum Wharf. Using a one-quarter mile walk distance, Courthouse Station will also serve developments in the easternmost portion of the Financial District, including International Place.

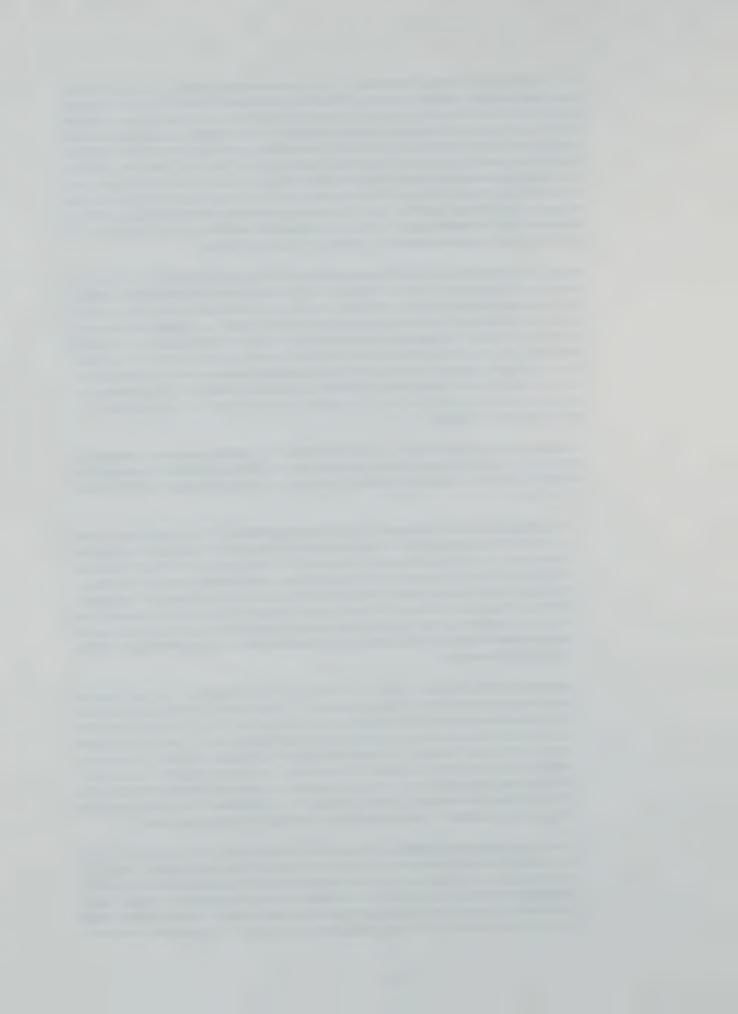


In their comments on the Transitway's Draft Environmental Impact Report, officials from the Computer Museum stressed that the Courthouse Station should remain as close to Museum Wharf as possible. Museum Wharf currently attracts over a million visitors each year, and museum directors believe that convenient, accessible transit is likely to capture a considerable portion of these visitors and Museum staff if the service meets their needs. Needs include a short walk distance from the Transitway station, and easily accessible vehicles that can accommodate strollers, baby carriages, and wheelchairs. Future transportation developments, such as water shuttle services expected to dock at Fan Pier, and the existing Northern Avenue Bridge, which is proposed for conversion as an enhanced pedestrian walkway, would also be well-served by station headhouses in the vicinity of Farnsworth Street.

Based on these factors, the MBTA believes that the Piers area would be ill-served by a relocation of Courthouse Station. While the MBTA recognizes that pedestrian safety is of paramount concern given the midblock location of station headhouses in the vicinity of Farnsworth Street, such headhouse locations have been successful elsewhere in the MBTA system. For example, the Kendall and Kenmore Stations are at mid-block locations. Easy access to these stations is achieved in several ways. At Kenmore Station, headhouses on either side of Commonwealth Avenue lead to a mezzanine, while passengers accessing Kendall Station are eased across the highly defined mid-block crossing by flags set into the median of Main Street in Cambridge and a pedestrian actuated signal.

As described in the FEIS/FEIR, Courthouse Station will be designed with a mezzanine accessible from both sides of New Northern Avenue. Other mitigation measures that the MBTA commits to implement with approval from such agencies as the BTD include the following:

- Courthouse Station entrance/exit at Pittsburgh Street. The headhouse located at the southeastern corner of New Northern Avenue and Pittsburgh Street will be open as a Courthouse Station entrance/exit. Previously, this headhouse was designated as an emergency exit only, with the main station entrance/exit headhouses located on both sides of New Northern Avenue in the vicinity of Farnsworth Street. The designation of all three headhouses for station entrance/exit will improve pedestrian circulation at Courthouse Station, and will now allow pedestrians to access the station at the New Northern Avenue/Pittsburgh Street signalized intersection.
- Installation of a barrier. A fence or other barrier along the New Northern Avenue median would prevent mid-block crossings. The current median plan for New Northern Avenue does not provide for any such barrier. The MBTA will work with other agencies, such as the BRA, on the final landscaping plan for the New Northern Avenue median. In combination with a median barrier, a pedestrian actuated signal could be installed at the midblock headhouse location. A change in the color and material of the crossing could also be provided to alert motorists that this is a pedestrian crossing. At a minimum, the crosswalk striping here should be very wide so motorists have a strong visual cue that crossings may occur.
- Clear signage and graphics. Provision of clear signage and graphics both at
  the station level underground and at the street level will greatly facilitate
  communication with pedestrians. Prominent below level signage will direct exiting
  passengers to the appropriate side of New Northern Avenue so they can reach
  their destinations without crossing the street at the surface. Headhouses at street
  level will be marked by a strong and highly visible design. It is also the intention of



the MBTA to have a community relations person in the station to answer questions and direct station users to destinations in the Piers area.

#### Comment 33:

One concern of the City and BRA that has not been adequately addressed is the issue of angle parking along New Congress Street in order to provide a bus lane while preserving on-street parking in the Bus/TSM alternative. While we recognize that the Bus/TSM alternative is not the selected option for the project, we find that the fact that the description of this alternative still includes angle parking, in spite of our serious objections on the grounds of potential traffic hazards that would result, is not an acceptable response. In addition, we must reiterate that the proposal to create angle parking at the median of New Congress Street is contrary to our urban design goals for this boulevard and would hinder the success for major new development.

### Response:

No angle parking on New Congress Street is contemplated as part of the Transitway Project. Angle parking on New Congress Street was proposed as part of the Bus/ Transportation System Management (TSM) Alternative defined in the FEIS/FEIR. Such a parking arrangement was necessitated under this alternative as the result of the proposed construction of a bus lane on New Congress Street. To permit construction of this bus lane, curb lane parking was proposed to be moved to the median of New Congress Street and arranged in an angle configuration in order to avoid a loss in the net number of relocated spaces.

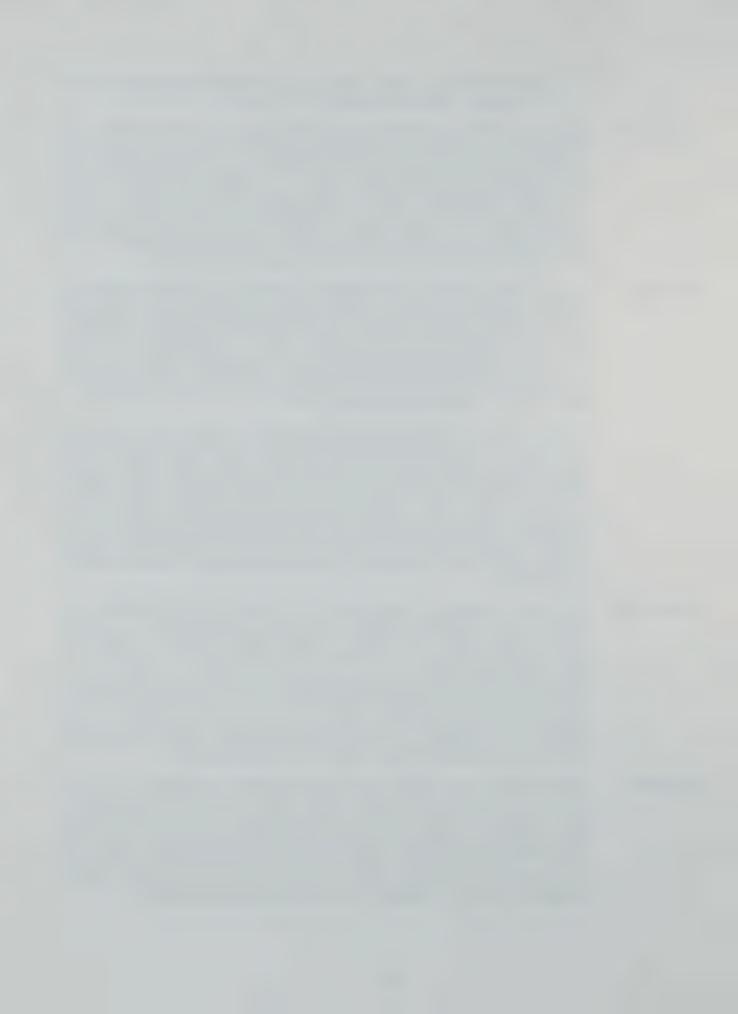
The MBTA recognizes the undesirability of a bus lane in the curb lane and angle parking along the median of New Congress Street. The BTD, BRA, and Boston Environment Department (BED) all expressed serious concerns about TSM measures deemed necessary by the MBTA as part of the Bus/TSM Alternative to support transit demand in the Piers area. In part as a result of these concerns, the MBTA rejected the Bus/TSM Alternative in favor of the full build Transitway as the locally-preferred alternative; however, the definition of the Bus/TSM Alternative was not altered in the FEIS/FEIR. The MBTA does not advocate the creation of angle parking if traffic safety is compromised. Again, angle parking is not proposed as part of Transitway Project implementation.

## Comment 34:

With respect to excavate disposal requirements, it is noted that the Full Build project would generate an estimated 637,500 cubic yards of excavate material. The majority of this excavate would not be suitable for ocean disposal or project reuse and thus would require landfill disposal. The FEIS/R concluded that there would be sufficient instate capacity to accommodate these requirements. However, this analysis fails to consider another major demand on landfill capacity in the coming years – the Boston Harbor Dredging Project, which is estimated to generate approximately 2.9 million cubic yards of dredge material, of which some 274,000 cubic yards would not be suitable for ocean disposal. This requirement also needs to be taken into account in determining the adequacy of landfill capacity for the Transitway project.

#### Response:

Implementation of the full build Transitway is estimated to generate 637,500 cubic yards of excavate material, 396,490 cubic yards of which are anticipated to be generated over a five-year period from 1995 through 1999, while the remaining 241,010 cubic yards will be generated in the years 2003 through 2005. Of this volume of material, only 172,200 cubic yards will likely need to be disposed of in solid waste landfills. The remaining portion will be utilized as project backfill (132,700 cubic yards), landfill cover material (114,000 cubic yards), landfill lining or capping material (183,600 cubic yards), or disposed of in ocean waters (35,000 cubic yards).



The Department of Environmental Protection's preliminary estimates of cover and closure material demand for unlined landfills in Massachusetts indicates a demand capacity exceeding that generated by both the CA/T Project and the Transitway Project. These estimates do not include the demand generated by the state's lined landfills. A survey of lined landfills within a 25-mile radius of Boston conducted for the transit project's FEIS/FEIR indicates demand capacity for the Transitway Project material.

Given the demand for cover and closure material, competition for landfill space will likely be associated only with those materials that cannot be utilized and must be disposed of as a solid waste. For the Transitway Project, this is limited to approximately 172,200 cubic yards of miscellaneous fill, contaminated fill, and ocean mucks, the generation of which will occur over an eight-year period.

The Boston Harbor Navigation Improvement and Berth Dredging Project (BHNIP) will generate approximately 3.4 million cubic yards of dredge material, the majority of which is deemed suitable for unconfined open water ocean disposal. However, approximately 1.3 million cubic yards will not be suitable for open ocean disposal, due to a combination of factors including material composition and quality. Options for disposal of this material identified in the BHNIP DEIR/S (Massport, April 1994) include both land-based alternatives, such as disposal in existing landfills, and aquatic alternatives, such as capping the material in ocean gravel mining pits.

As noted in the BHNIP DEIR/S, the selection of a preferred disposal alternative is required under the National Environmental Policy Act (NEPA). Based on this requirement, the DEIR/S recommends disposal of the dredged material generated by the implementation of the BHNIP at a combination of open and confined ocean disposal sites. These sites were selected "on a totality of factors including least environmental impact, logistics, capacity, and cost." Given this recommendation and its basis, disposal of BHNIP-generated materials is not anticipated to result in space competition with the Transitway or CA/T Projects.

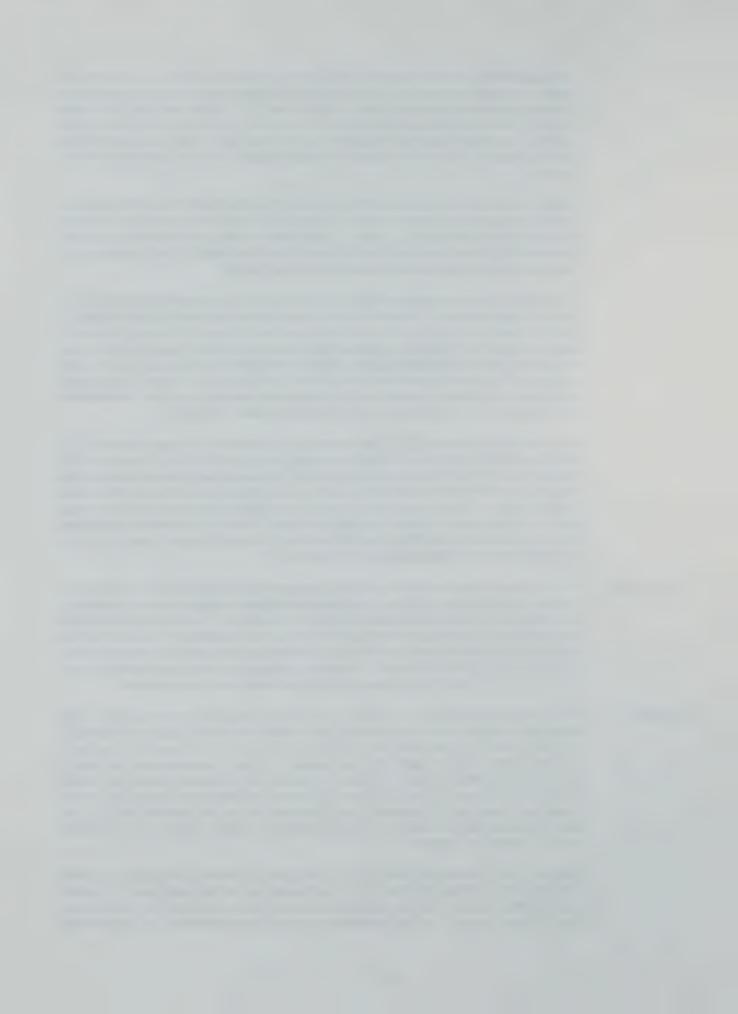
#### Comment 35:

Both the modified sunken tube and the cofferdam methodologies under consideration for the crossing of the Fort Point Channel would require that approximately one-half of the Channel be blocked to permit construction of the tubes. Yet the FEIS/R indicates that there would be temporary changes in tidal current velocities in the vicinity of the cofferdam with this method but that the modified sunken tube method would have virtually no impact on tidal velocity. Since in both instances the same area of channel would be blocked, the different impact on tidal velocities should be explained.

#### Response:

The immersed tube method of crossing the Fort Point Channel will not require the rigid blockage of any portion of the channel. As noted in the transit project's FEIS/FEIR, construction by this method will require that two parallel rows of sheet piles be driven into the channel bed to preclude the necessity of side slope excavation during dredging operations. These sheet piles will extend only six inches above the existing floor of the channel and, hence, pose no significant impediment to present tidal current patterns or velocities. Conversely, the cofferdam method will require that a similar pair of parallel rows of sheet piles extend above the surface of the water, effectively blocking half of the channel.

Mitigating the potential sediment plume generated by the open dredging associated with the semi-confined immersed tube method will involve the placement of in-water silt curtains. Although slightly permeable to water, these curtains will impede water flow to some degree. The impediment to flow would, nonetheless, be considerably



less than that associated with the rigid, impermeable structure envisioned for the cofferdam method. As noted in the FEIS/FEIR, calculations of the hydrologic impact of the more constrictive cofferdam method indicate it would not measurably reduce channel flushing, and would not increase the weak currents of the channel to velocities at which bottom scour would result. Impacts of the semi-confined immersed tube method will be even smaller.

#### Comment 36:

It is noted that available Federal (ISTEA) funding will cover only 64 percent of the first phase of the Transitway project, not 80 percent as originally anticipated. No Federal assistance is as yet available for the second phase of the project. Further, the FEIS/R indicated that if additional Federal funds are not forthcoming, then the implementation schedule would need to be extended until new sources of funding were identified. The specific meaning of this is unclear. Would the MBTA only construct a reduced Phase 1 project (e.g., MOS-1)? The City would not support a limited project such as MOS-1 since we believe it would severely hinder development opportunities in the Fan Pier and Commonwealth Flats areas. Therefore, should additional Federal funds not be available, then the MBTA must pursue alternative funding sources to ensure the implementation of this critical transit project.

#### Response:

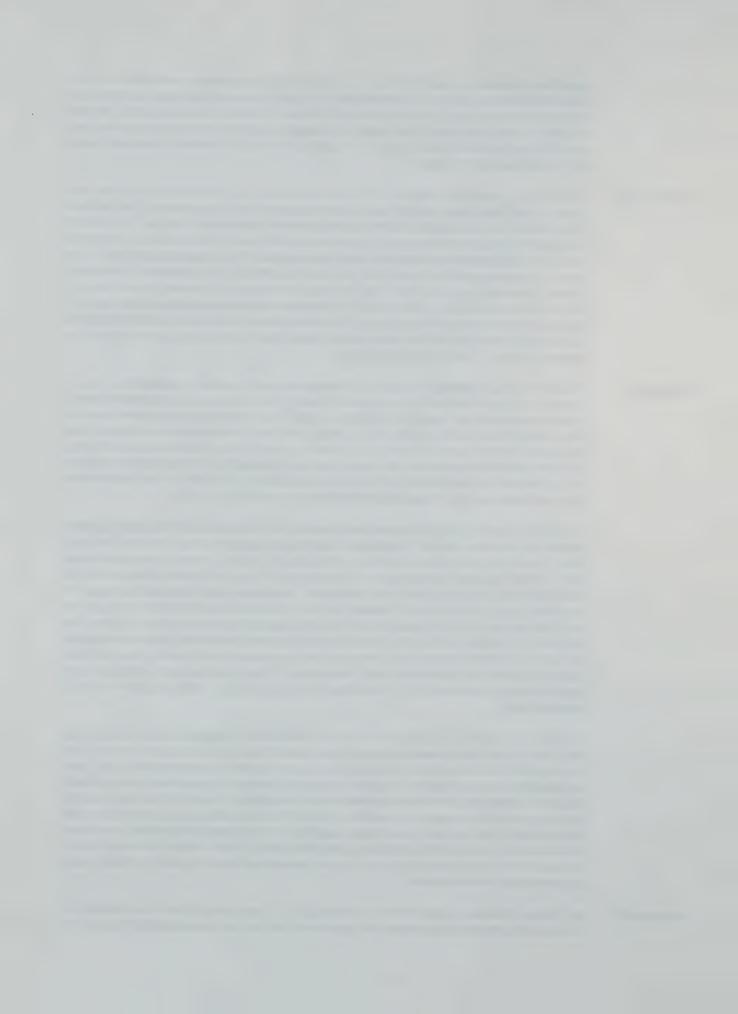
The MBTA has selected the full build Transitway as its preferred alternative. Consistent with anticipated development plans in the South Boston Piers area, implementation of the Transitway will be staged. The initial build segment will extend from South Station to the World Trade Center, and the full build segment will continue the tunnel from South Station to Boylston Station. The MBTA is committed to achieving revenue service on the initial build segment of the Transitway by the year 2000. Federal funds totalling \$278 million have been authorized for this segment in the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991.

As noted in the FEIS/FEIR, federal funds currently authorized in ISTEA cover approximately 64 percent of the Transitway initial build capital costs. The MBTA, with Congressional support, submitted a request in January 1994 for an additional \$72.7 million in federal authorization for the project. These additional dollars will bring the total ISTEA authorization to 80 percent of Transitway initial build capital costs. In the event that authorization of federal funds is delayed, the MBTA will make up the shortfall; no reduction in the scope of the initial build project would result. Given the high level of federal funding for the initial build segment and the aggressive schedule for opening of revenue service in the year 2000, no alternative financing mechanisms are anticipated for the initial build Transitway. Such mechanisms may be more appropriate for extension of the Transitway to Boylston Station in the project's full build configuration.

To date, no federal dollars have been authorized by Congress for the full build segment of the Transitway extending from South Station to Boylston Station. The schedule for this segment anticipates design beginning in the year 2000, with construction starting in 2003. The MBTA will work with its Congressional delegation to secure federal funds for this segment of the Transitway Project; 80 percent federal participation will be sought. In addition, the MBTA will continue to pursue alternative sources of funding for the project, such as joint development with midtown development parcels (for example, Lafayette Place II and Parcel 30/Keith Block); privatization of certain project elements; and alternative financing arrangements, such as certificates of participation.

#### Comment 37:

At Boston Common, construction of the Boylston Transitway Station is expected to temporarily restrict pedestrian circulation and according to current MBTA plan, to



require the temporary taking of a portion of Lafayette Mall for a traffic detour lane. The BRA has serious concerns with this proposal and considers it to be an unresolved issue. To mitigate any construction-related impacts to the Common, we recommend that it would be appropriate for the MBTA to assist financially in the implementation of the *Boston Common Management Plan*.

#### Response:

As indicated in the FEIS/FEIR, a portion of Tremont Street will be closed during the construction of a station slurry wall along the street. To maintain three lanes of traffic during slurry wall construction, one lane of traffic will be temporarily detoured onto Lafayette Mall. Once construction activities cease, the sidewalks of Tremont Street and the Boston Common will be restored consistent with the *Boston Common Management Plan*.

Aside from restoring that portion of the southeastern corner of Boston Common impacted by Transitway construction in a manner consistent with the Plan, the MBTA does not believe, as suggested by the BRA, that further financial assistance in the Plan's implementation is an appropriate mitigation measure. The construction of the Transitway will substantially increase access not only to the Boston Common, but also to open space in the Piers area, as well as to Harborwalk and the Fort Point Channel. This is particularly important for Chinatown which has the least amount of open space for its residents of any neighborhood in the city.

#### Comment 38:

In addition, we request that New Northern Avenue, which is currently under construction, be restored by the MBTA to its condition prior to the initiation of the Transitway work.

#### Response:

The MBTA commits to work with MHD and BTD to restore New Northern Avenue to its condition prior to initiation of the Transitway work. In addition, the MBTA will work with these agencies to develop a permanent landscaping plan for the avenue.

#### Comment 39:

Finally, we note that the Response to Comments Appendix only quoted excerpts from the comment letters and did not include the comment letters themselves. We do not find this to be appropriate or acceptable for reviewers, as the context in which comments are made can be just as important as the comment itself. Further, one cannot tell whether all comments have been addressed if the letters themselves are not included (for example, several important comments in the City's Transportation Department letter on the DEIS/SDEIR were not responded to).

## Response:

The MBTA regrets any inadvertent oversight in preparation of its *Response to Comments Appendix*. In this Draft Section 61 Finding, comment letters received on the FEIS/FEIR are reprinted in their entirety.





## The BOSTON SHIPPING ASSOCIATION, Inc. Charlestown Navy Yard, 33 Third Avenue, Boston, MA 02129-4518 Telephone (617) 242-3303, FAX (617) 242-4546

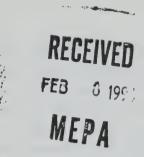
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A. ROSS POPE, President ARTHUR J. BOYLE, Vice President JOSEPH M. KEEFE, Treasurer ANNE D. AYLWARD, Secretary & Assistant Treasurer

ALFRED E. FRIZELLE, General Manager

February 4, 1994

Executive Office of Environmental Affairs MEPA Office 100 Cambridge Street 20th Floor Boston MA 02202



RE: EOEA 6826, South Boston Piers/FortPoint Channel Transit Project

Dear Sir and/or Madame:

The Boston Shipping Association has reviewed the FEIS/R for the South Boston Piers Transit Project EOEA 6826 and found that although we support the project; our concerns have not been addressed adequately. The traffic planning and management strategies offered by the MBTA did not include trucks in a meaningful way; as these vehicles are currently the indigenous vehicles to the area.

We received written responses to the comments, made in response to the DEIR, and chose not to respond. These comments referenced a document which had not been released to the public, the FEIS/R. Without the proper context responding to the MBTA's responses, would have been made in a vacuum. We consider the MBTA's action climbing new heights in the public process. Our concerns about the project remain the same.

The primary concern of adequate truck access to the Port, in the Fort Point area of South Boston is severely inhibited by the interim bus operation and in fact does not improve with the MOS-2 after it is built. The full build option is the most effective and yet does not alleviate the disruption at important intersections for trucks. The design will place buses at an intersection which has none currently, nor has a properly designed intersection by the Central Artery. These buses exacerbate an impossible situation without design change by one project or the other. The short stretch of roadway being referred to is from Summer Street to Northern Avenue on D Street Extended. The location of the portal with the attendant 89 to 166 buses per hour also is the major routing for trucks going to and from the Port is not in any ones interest. Here is a location where transportation interests are favoring one kind of economic growth over another; the region needs both.

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- The South Boston Designated Port Area(DPA) truck study recently released by the CAT is a less than satisfactory product which does not include the interim bus numbers from the piers project. MBTA reliance on the CAT traffic numbers is not comforting and the BSA would call into question their accuracy. In addition, the Transit project's traffic analysis concludes that the intersection of the D street and the portal fails in the analysis hours. This is not encouraging when there are real reasons to believe that the traffic numbers have been underestimated. A bus study is in order to answer the question of piers area service.
- In the air quality analysis section, the truck numbers remain the same in the chart; a clarification is needed.
- The Boston Shipping Association has continued to bring these issues and anomalies to the attention of Federal and State approval agencies for both projects. There are examples of coordinated efforts in some sections of the projects particularly as it relates to effective use of funds; but otherwise these aspects when described in public documents tend to shift responsibility to the other project for the impact or the mitigation and in no place is this a more profound issue than at this location.
- In all probability the reviewing engineers are not the same on the federal level, but some means of relief such as a joint review process is necessary to finally resolve this conundrum.

  If the issue was redefined as project coordination and maximizing resources; then progress
- could be made. In addition, there may be some merit into reopening the dropped alternative of the red line loop given other changes in the Central Artery design.
- The Assoication appreciates your acknowledgement of the Waterways license needed under Chapter 91 however the premise of your statements about increasing the access to the waterfront does not apply in this case. The functional occupants of the Port view the statement about access as disruption and preemption of legitimate uses of the waterfront which do not seem to be acknowledged except a some romantic notion or historical footnote. Access to the waterfront in this case, is the designated port area (DPA); these rights are protected and constitute one of the standards for achieving a proper public purpose under the regulations. Therefore, we are also concerned with the location of the proposed bus and a maintenance facility in the DPA.

We applaud the project for inserting a lower growth scenario to the ridership analysis. The Fort Point Channel area is a capacity based planning effort where development is tied to transportation. In addition square footage of space devoted to the range of land uses in the area must be kept in balance. Maritime Industrial uses potentially will be lowered with the displacement of the New England Seafood Coop, and the selection of site A for the bus



maintenance facility each will reduce DPA Square Footage. By looking the ratio of loss by land use category, you can see that maritime support uses have shouldered the burden for first the development growth and now for the transit, which is needed to support the ridership as a result of the growth.

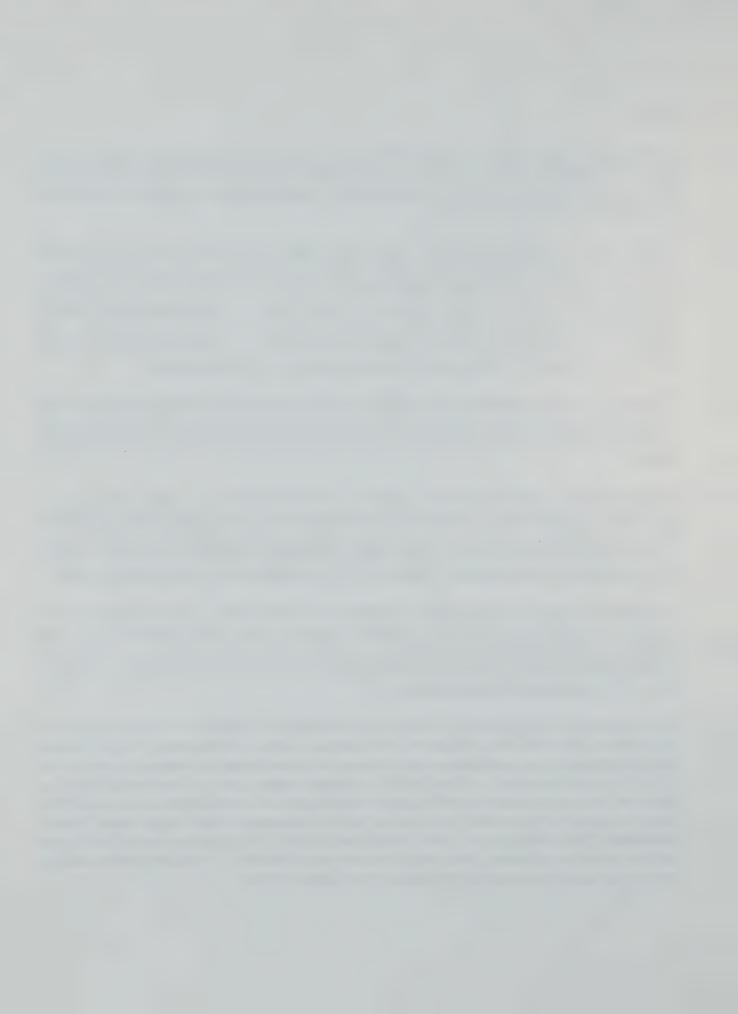
Selecting site A would remove more land for port related which, in favor of other uses which could be located elsewhere. Taken together, with the unresolved question of the taking of the New legland Seafood Coop, another designated port real, located a short distance from the Fish located that would be better relocated to site A, that allowed the maintenance facility; the Shipping Association would strongly urge the maintenance facility be located at the MBTA lower Station on East First Street Although it is the recommended site, neither has it been considered; and it may be located somewhat closer than Site B.

This panel is under ownership of the MBTA and has transpositation uses including the #7 bus route functioning there. It is not developed to full capacity. The BSA considers this combined decision a double blow to the port of Boston and it's capability to function in the future.

Finally the BSA supports further examination of water transit as a viable alternative to satisfy the well documented demand between North Station and the piers area. In addition there is a benefit to reviewing the corridor needs as well as ridership figures with the Central Artery Rail Link(CARL) which could be viewed as complementary services similar to the discussions related to the Washington Street Replacement Study and the project.

In terms of design, by changing the technology to trackless trolley; the illustration shown in figure 5-5 shows the comparison between cars and trolley and also the view of the catenary designed into the street lighting. The design standards should also include the turning radii for trucks at relevant intersections for the placement and height of catenary so as not to interfere with truck trailers.

We appreciate the piggybacking of design and construction efforts to save resources where it is needed. But tieing the mitigation of the project, to the Central Artery Project section design engineers, is not acceptable, since there is no agreed upon mitigation plan except for a verbal commitment not to allow traffic to descend below Level of Service (LOS) D. At this time, the maintenance of traffic plan promised, has not been distributed and the BSA is not inclined to believe the existence of such a document; when design issues remain unresolved. The South Boston Piers Transit project given the impacts to waterfront access and the other development going on in the area needs and must have a mitigation package which is in addition to the that offered by the Central Artery.



The Boston Shipping Association is in favor of the project and gives its support to transit in as much as it reduces the number of passenger vehicles which interfere with the carriage of goods to and from the Port of Boston. is isn't any intention of delaying the project however, our recent experiences with the Cental Artery concerning stonewalling over vital port issues; has tested our pateince to the limit. The BSA will not be sullied into believing these issues will work themselves out. I am confident that the recommendations made to be in the best interest for our goals for Boston and the BSA looks forward to working with the proponents to make this a successful project.

On behalf of the Boston Shipping Association Sincerely,

Ellen m Janeng

Ellen M. Spring an ovegreal Signiture if there is any question



## **Boston Shipping Association, Inc.**

#### Comment 40:

The traffic planning and management strategies offered by the MBTA did not include trucks in a meaningful way; as these vehicles are currently the indigenous vehicles to the area. The primary concern of adequate truck access to the Port, in the Fort Point area of South Boston is severely inhibited by the interim bus operation and in fact does not improve with the MOS-2 after it is built. The full build option is the most effective and yet does not alleviate the disruption at important intersections for trucks. The design will place buses at an intersection which has none currently, nor has a properly designed intersection by the Central Artery. These buses exacerbate an impossible situation without design change by one project or the other. The short stretch of roadway being referred to is from Summer Street to Northern Avenue on D Street Extended. The location of the portal with the attendant 89 to 166 buses per hour also is the major routing for trucks going to and from the Port is not in any ones interest. Here is a location where transportation interests are favoring one kind of economic growth over another; the region needs both the.

#### Response:

The MBTA believes that both passenger and freight transportation are vital to the development of the South Boston Piers area and this area's contribution to the regional economy. The MBTA shares Boston Shipping Association's (BSA) concern that passenger travel should not impede truck traffic in this vital area, including the avoidance of any conflicts between Transitway services and truck traffic. It is also important to point out that the MBTA has designed the Transitway with the goal of reducing total passenger vehicle traffic in the South Boston Piers area. This goal is served by attracting riders to high occupancy vehicles and by placing these vehicles in a tunnel in the most congested parts of the area. A transition to surface operation in the eastern portion of the area, where surface congestion is expected to be less than in the western and central portions, is cost-effective and, therefore, in the best interests of the public.

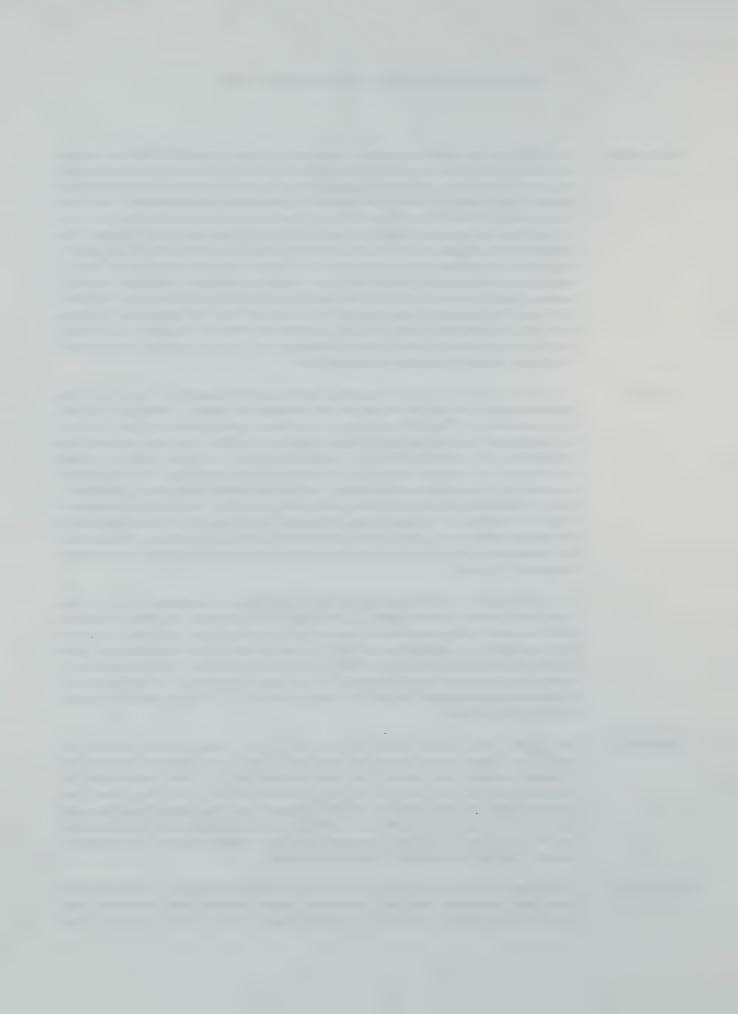
The MBTA will work with interested parties to minimize any negative impacts of the Transitway service on truck traffic. Estimates of truck movements, their interaction with other area traffic, and other associated problems that need to be resolved have been, and will be, provided by the CA/T Project as part of the South Boston Truck Access and Circulation Study (April 1994) which will be updated as part of the project's forthcoming Notice of Project Change. If that study determines that conditions on D Street are unacceptable, the MBTA will work with the CA/T Project and other parties to resolve the problem.

#### Comment 41:

The South Boston Designated Port Area (DPA) truck study recently released by the CAT is a less than satisfactory product which does not include the interim bus numbers from the piers project. MBTA reliance on the CAT traffic numbers is not comforting and the BSA would call into question their accuracy. In addition, the transit project's traffic analysis concludes that the intersection of the D street and the portal fails in the A.M. and P.M. peak hours. This is not encouraging when there are real reasons to believe that the traffic numbers have been underestimated. A bus study is in order to answer the question of piers area service.

#### Response:

In response to comments submitted on the referenced South Boston Designated Port Area (DPA) truck study, the CA/T Project has revised the study and published a final South Boston Truck Access and Circulation Study in April 1994. This study was



prepared subsequent to the BSA's comments on the FEIS/FEIR for the South Boston Piers Transit Project.

Analysis years for the truck study are 1996 and 2010. Since the Transitway does not begin operation until the year 2000, the truck study's 1996 analysis does not incorporate interim bus volumes for the transit project. The 2010 analysis, however, does include full build Transitway bus volumes. This analysis is being revised by the CA/T Project as part of its forthcoming Notice of Project Change. BSA has been briefed both on the methodology for analyzing traffic in the DPA and the results of the truck study analysis.

The MBTA, as directed by the Executive Office of Transportation and Construction at the outset of the Transitway Project, has utilized the transportation network and traffic volumes forecasted by the CA/T Project. The network and volumes have undergone close scrutiny by various local, state, and federal agencies, including both the Federal Highway Administration and Federal Transit Administration which have approved the methodology for developing the transportation network and forecasting future traffic volumes. The coordinated use of data between the MBTA and CA/T Project ensures that analysis results are consistent and comparable.

The assertion that the transit project's traffic analysis shows intersection failure in the a.m. and p.m. peak hours at the intersection of D Street and the Transitway portal is false. As documented in the transit project's FEIS/FEIR, the portal operates at level of service (LOS) A in the p.m. peak hour; this is true both for the initial build and the full build Transitway. No a.m. peak hour traffic analysis was performed consistent with the requirements for EIS preparation, but it is expected that the D Street/Transitway portal intersection will operate at LOS A in the morning hour, as well.

The MBTA does not believe that a bus study, in addition to the traffic analysis provided in the FEIS/FEIR and separate from the truck study under preparation by the CA/T Project, is warranted given the relatively low volume of Transitway vehicles operating on surface streets throughout the Piers area. By implementing the Transitway Project, traffic congestion in the DPA is reduced, since the project has been designed to shift automobile trips to transit trips.

### Comment 42:

In the air quality analysis section, the truck numbers remain the same in the chart; a clarification is needed.

## Response:

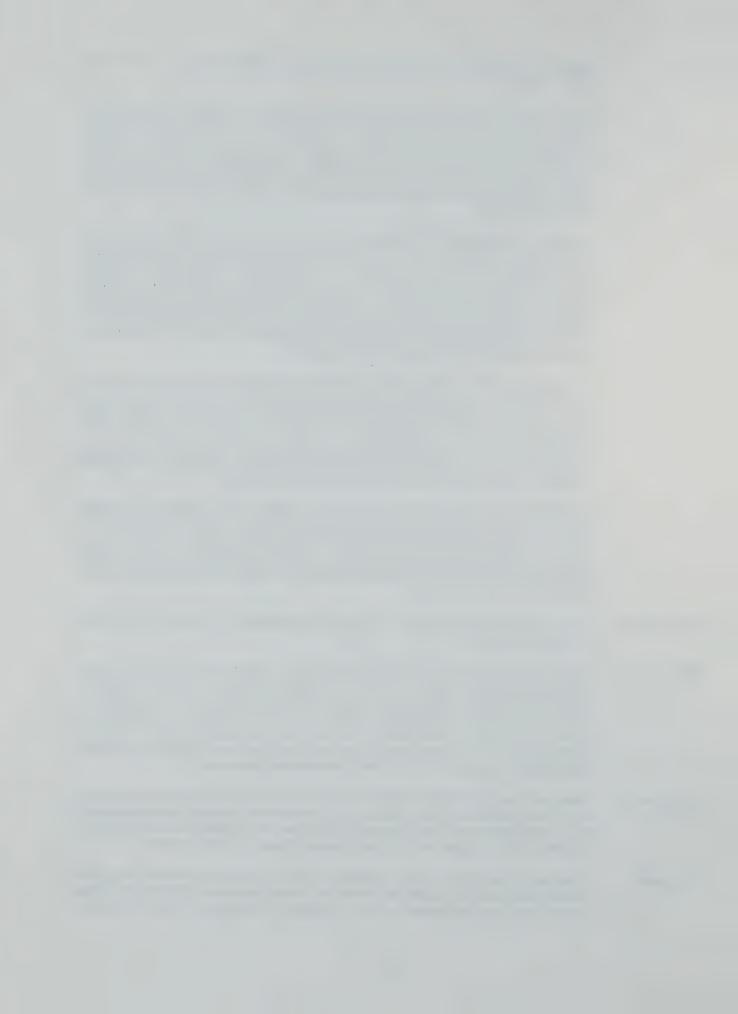
The regional daily vehicle miles traveled (VMT) presented in the transit project's FEIS/FEIR (Table 5-9) are listed for several vehicle categories. VMT for both gasoline and diesel heavy duty trucks weighing more than 8,500 pounds do not vary from one alternative to another. The number of trips made by these vehicles will not be affected by transit operations, since trucks do not transport passengers. In other words, the number of gasoline and diesel heavy duty trucks weighing more than 8,500 pounds will be the same, regardless of which transit alternative is implemented.

#### Comment 43:

There are examples of coordinated efforts in some sections of the projects particularly as it relates to effective use of funds; but otherwise these aspects when described in public documents tend to shift responsibility to the other project for the impact or the mitigation and in no place is this a more profound issue than at this location.

## Response:

In its planning and design of the Transitway Project, the MBTA has worked closely with federal, state, and local agencies, as well as private businesses and citizens. Close coordination has been essential given the number and scope of other construction



activities that will be taking place concurrent with the Transitway. For example, the MBTA has been working with the CA/T Project, Boston Transportation Department (BTD), Massachusetts Port Authority (Massport), BSA, and others throughout preparation of the *South Boston Truck Access and Circulation Study*. This coordinated effort was intended to develop appropriate and adequate mitigation for traffic circulation in the South Boston DPA. The MBTA will continue to address and resolve issues of concern to the BSA as plans for construction and implementation of the Transitway are advanced.

### Comment 44:

In all probability the reviewing engineers are not the same on the federal level, but some means of relief such as a joint review process is necessary to finally resolve this conundrum. If the issue was redefined as project coordination and maximizing resources; then progress could be made.

# Response:

The public review process for the South Boston Truck Access and Circulation Study has provided an opportunity for a wide variety of interests, both public and private, to comment on the proposed mitigation for traffic in the South Boston DPA. In addition, coordination at the federal level has occurred at various points throughout the planning for both projects.

## Comment 45:

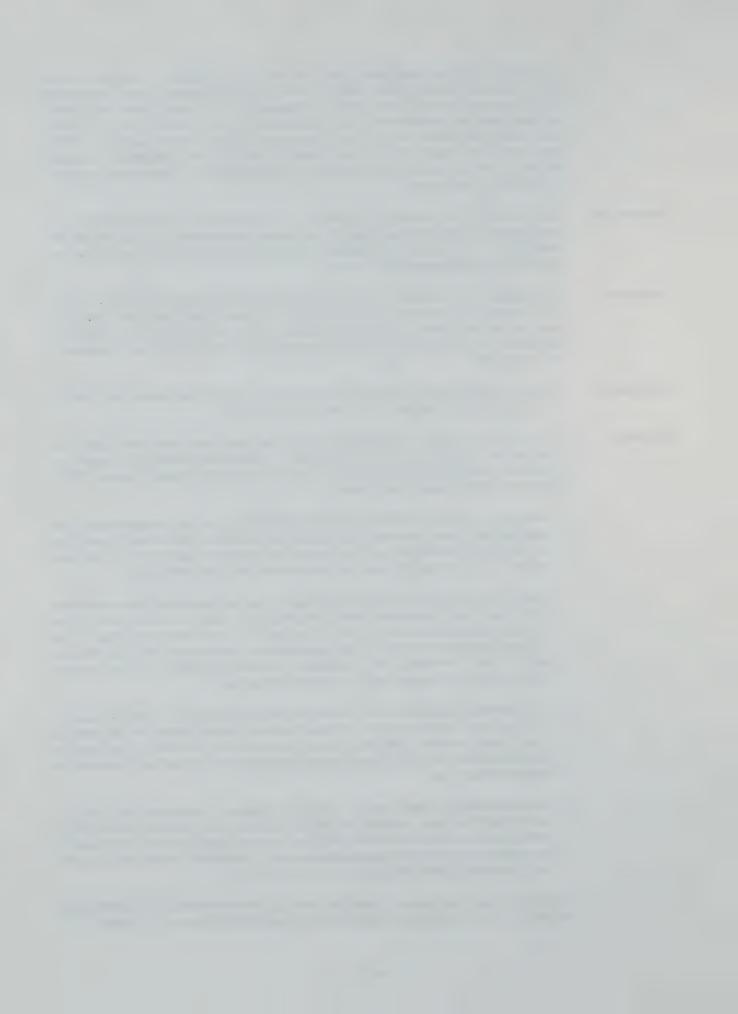
In addition, there may be some merit into reopening the dropped alternative of the red line loop given other changes in the Central Artery design.

## Response:

The Red Line Loop was eliminated from further consideration in 1989 given disadvantages as compared to the Transitway. These disadvantages, which are discussed in detail in the project's Draft Environmental Impact Report (DEIR, September 1989), include the following:

- Inability to stage construction. The entire Red Line Loop would need to be constructed to provide revenue service to the Piers area. Given fiscal constraints at the MBTA, the large near-term financial outlay was determined to be less desirable than the staged investments associated with the Transitway.
- Lost ridership on the Red Line South due to increased travel times.
  Construction of a Piers area loop on the Red Line South would add up to three
  minutes of travel time for approximately 43,750 daily Red Line riders. The
  increased travel times would result in an estimated net loss of 4,800 daily trips on
  the Red Line compared to the Transitway. This loss translates into a net increase
  of 2,800 daily auto person trips in the southeast corridor.
- Inferior transit service to the central and eastern portions of the Piers area.
   The Red Line Loop Alternative included only one station located in the western third of the Piers area. The two stations planned for the Transitway one at Fan Pier/Courthouse and the other at World Trade Center provide better service for the entire Piers area.
- Poor cost-effectiveness rating. Due to the losses in ridership on the Red Line South, the Red Line Loop Alternative fails to attract a large enough number of additional new riders compared to other alternatives, including the Transitway, to achieve an acceptable cost-effectiveness rating. (Cost-effectiveness measures the cost of attracting each new rider to a transit alternative.)

Concurrence with elimination of the Red Line Loop was received in the Certificate of the Secretary of Environmental Affairs on the project's DEIR (February 12, 1990).



#### Comment 46:

The Association appreciates your acknowledgement of the Waterways license needed under Chapter 91 however the premise of your statements about increasing the access to the waterfront does not apply in this case. The functional occupants of the Port view the statement about access as disruption and preemption of legitimate uses of the waterfront which do not seem to be acknowledged except a some romantic notion or historical footnote. Access to the waterfront in this case, is the designated port area (DPA); these rights are protected and constitute one of the standards for achieving a proper public purpose under the regulations. Therefore, we are also concerned with the location of the proposed bus and a maintenance facility in the DPA.

### Response:

In enhancing access to the waterfront, the Transitway Project provides high quality, high capacity transit service to existing and new jobs throughout the South Boston Piers area, including the DPA, for employees who may have no other form of transportation. The MBTA is concerned about BSA's implication that the Transitway is primarily a means of transporting visitors to the waterfront who will in some way disrupt or preempt "legitimate" activities in the DPA. In spite of BSA's assertion, the MBTA's planning for the Transitway has been conducted in response to a significant forecasted increase in travel demand in the Piers area by the year 2010. While it is certainly true that some Transitway riders will be tourists visiting the many Piers area cultural institutions, such as Museum Wharf, and some may even take advantage of Harborwalk to view Boston's working waterfront, the Transitway has been designed to serve the highest volumes of trip demand that occur in the A.M. and P.M. peak hours. The great majority of these A.M. and P.M. peak hour trips, it should be pointed out, are employees, not tourists. Furthermore, the BSA should be aware that public access to the waterfront via the planned Harborwalk is protected by Chapter 91 regulations.

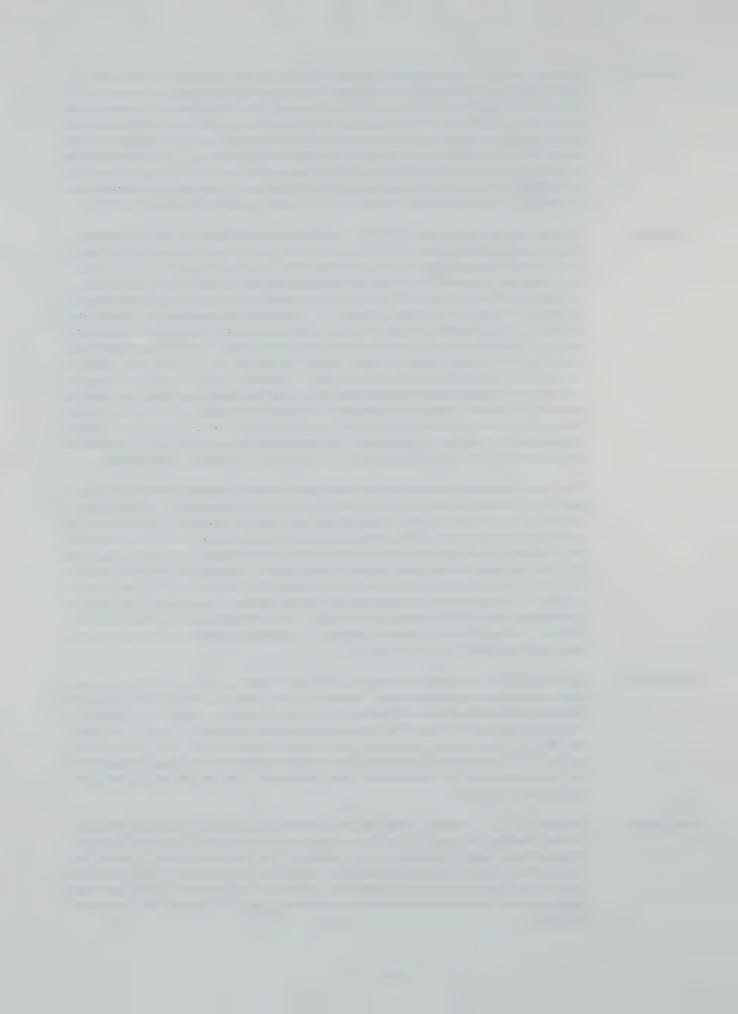
The Transitway's storage and maintenance facility will be located off West First Street between E Street and Pappas Way. The facility site is proximate to, but not located within, the South Boston DPA. Although this site is within Chapter 91 jurisdiction, no existing water-dependent uses will be disrupted; this was one of the primary reasons that the site was chosen over an alternate site at the corner of Summer Street and Pappas Way, which would have required the relocation of an existing water-dependent use. The Massachusetts Department of Environmental Protection (DEP) will review the MBTA's Chapter 91 license application in the context of a determination that the Transitway Project and its maintenance facility are both defined as an "Infrastructure Facility: ...a facility which produces, delivers, or otherwise provides... transportation... services to the public" (310 CMR 9.02).

## Comment 47:

Selecting Site A would remove more land for port related uses; in favor of other uses which could be located elsewhere. Taken together, with the unresolved question of the taking of the New England Seafood Coop, another designated port use, located a short distance from the Fish Pier that would be better relocated to Site A, than siting the maintenance facility; the Shipping Association would strongly urge the maintenance facility be located at the MBTA Power Station on East First Street. Although it is not a recommended site, neither has it been considered; and it may be located somewhat closer than Site B.

### Response:

In the FEIS/FEIR, the MBTA analyzed two potential sites for the Transitway Project's maintenance and storage facility. Site A is located at the corner of Summer Street and Pappas Way, while Site B is located on West First Street between E Street and Pappas Way; both sites are located within Chapter 91 jurisdiction. These two sites were screened from a larger number of potential sites, and both were deemed appropriate for location of a maintenance and storage facility to support the Transitway Project.



After several meetings with Massport and Pappas Management Corporation, the owners or representatives of the owners of the two sites under consideration, the MBTA has selected Site B on West First Street for location of the Transitway Project's maintenance and storage facility. The site is preferable over Site A given that no impact to existing water-dependent uses would result. Site B also meets several other important design criteria:

- Selection of this site will not displace any existing water-dependent use. This criterion is particularly important, since the economic vitality of South Boston depends in large part on the area's water-dependent businesses and industries. A portion of Site A located at the corner of Summer Street and Pappas Way is currently used for Subaru overflow vehicle parking; since these vehicles are transported by water, this overflow parking lot is determined to be a water-dependent use. Although Site B is also within Chapter 91 jurisdiction, it does not contain any existing water-dependent uses. It is, therefore, a more desirable location for the Transitway's maintenance facility. Tenants of the site, which is predominantly owned by Massport and partially owned by Atlantic, Inc., include Fortress Records, Corporate Printing Company, Shaughnessy Warehouse, Roadway Trucking, PPG Industries, Yankee Bus, Emerson College, NYNEX, U.S. Postal Service parking, Boston Harbor Industrial Development Corporation, and E Street Associates.
- The site is roughly one-half mile from the Transitway portal, and is located along a future Transitway route to residential South Boston as part of the full build configuration. This location thus minimizes non-revenue producing trips (i.e., "deadheading") for transit vehicles beginning or ending their service routes. It also reduces the need to install additional catenary (overhead wires that provide electrical power to the trackless trolley vehicles) as part of the full build Transitway to extend surface service into residential South Boston; catenary will simply be extended from the West First Street facility. The ability to utilize the same catenary for non-revenue trips to the maintenance facility and revenue trips into residential South Boston as part of the full build Transitway will reduce both one-time construction and ongoing operating and maintenance costs. In addition, combined use of the catenary will limit potential adverse environmental impacts, including visual and aesthetic impacts of the overhead catenary and support structures. This is an important issue as the Piers area streetscape evolves.
- The surrounding area is compatible with activities associated with the Transitway's maintenance and storage facility. The site is adjacent to other light industrial development, and the area in which it is located is expected to remain in such use for the long term. No residential or commercial areas will be affected.
- The site is physically suited to development as a maintenance and storage facility.
  There are a few structures on the site that would need to be removed. Utility service is adequate, eliminating the need for costly infrastructure work. The parcel is regularly shaped, enabling its efficient use for construction and operation of the facility.

Transitway operations would be problematic if the MBTA's power plant on East First Street was used for the maintenance facility. Since the East First Street site is across the Reserved Channel, the distance from the Transitway portal on D Street and, hence, non-revenue service, would be greatly increased. In addition, the site is not large enough to accommodate the required facility. Only six acres arranged in a poor



configuration are available at the East First Street site; a minimum of nine acres are needed for the maintenance facility. Existing power plant facilities would need to be relocated to make room for the Transitway maintenance facility.

Other key determinants arguing against location of the Transitway maintenance facility at the East First Street site include the fact that a new jet powered generating unit is being installed at the site. This is very sensitive equipment, which would be easily disturbed by the activities associated with construction of a maintenance facility at the site. In addition, the power plant is inactive due largely to the existence of asbestos which was estimated to cost approximately \$18 million to remove. Thus, the cost alone associated with cleaning the site and with increased deadheading would make the East First Street site financially infeasible.

### Comment 48:

[T]he BSA supports further examination of water transit as a viable alternative to satisfy the well documented demand between North Station and the piers area. In addition, there is a benefit to reviewing the corridor needs, as well as the ridership figures with the Central Artery Rail Link (CARL) which could be viewed as complementary services similar to the discussions related to the Washington Street Replacement Study and the project.

# Response:

The MBTA will attempt to integrate the Transitway with the water transportation terminals along the Fort Point Channel and World Trade Center while maintaining the station locations proposed in the FEIS/FEIR; these station locations have been based on overall optimal walk access throughout the Piers area. Although the sites of future docks are not finalized, as noted in the FEIS/FEIR, the Transitway stations are located within a reasonable walking distance of likely dock sites at Fan Pier and World Trade Center. However, there may be limited potential for transfers from the Transitway to water transportation services since, based on findings of previous studies, water transportation services to the Piers area will most likely serve inner harbor dock locations. Since the Transitway is intended to provide service to the Piers area from a variety of downtown Boston locations and rapid transit transfer stations, the advantages of transferring to water transportation services to reach similar destinations may be limited. The greatest advantage of integrating the Transitway with water transportation is to enhance the accessibility of inner harbor ferry services to passengers traveling to or from areas of the South Boston Piers that are beyond walking distance of the dock sites. To this end, the MBTA will cooperate with the future findings of the MHD's Inner Harbor Study in subsequent stages of project implementation. At a minimum, cooperative activities will include signage in Transitway stations. The MBTA will consider other activities that facilitate connections between the two transit services.

The North Station-South Station Rail Link would facilitate connections between the northern suburbs and the South Boston Piers area. Were the Rail Link to be constructed, passengers from northern suburbs could access South Station directly where they could then transfer to the Transitway service. This would eliminate the need for supplementary surface shuttle bus service to North Station as part of the Transitway Project. Blue Line riders would still need a surface shuttle bus from Aquarium Station to avoid a second transfer to reach the Piers area. Construction of the Transitway does not in any way preclude the Rail Link, which has been proposed to be constructed underneath the depressed Central Artery.

A consultant team has been selected to prepare an environmental impact statement for the North Station-South Station Rail Link which will incorporate the Transitway Project in its ridership forecasting model. As the Rail Link project progresses, minor



adjustments can be made to the Transitway's supplemental surface bus plan to reduce overall project costs and take advantage of the improved connections to the northern suburbs. Coordination will be ongoing as both projects proceed.

#### Comment 49:

The design standards should also include the turning radii for trucks at relevant intersections for the placement and height of catenary so as not to interfere with truck trailers.

### Response:

The Transitway's surface catenary system will be designed in conjunction with other streetscape elements in the South Boston Piers area. The MBTA is currently working with the South Boston Streetscape Committee which has been convened to develop a design for the Piers area's streetscape; committee members include representatives from the City of Boston, Massport, and CA/T Project. The MBTA will integrate design of the catenary system associated with surface operation of Transitway trackless trolley vehicles with the area's streetscape elements, including lighting, trees, and signage. This integration will ensure compatibility and cohesion of the area's streetscape.

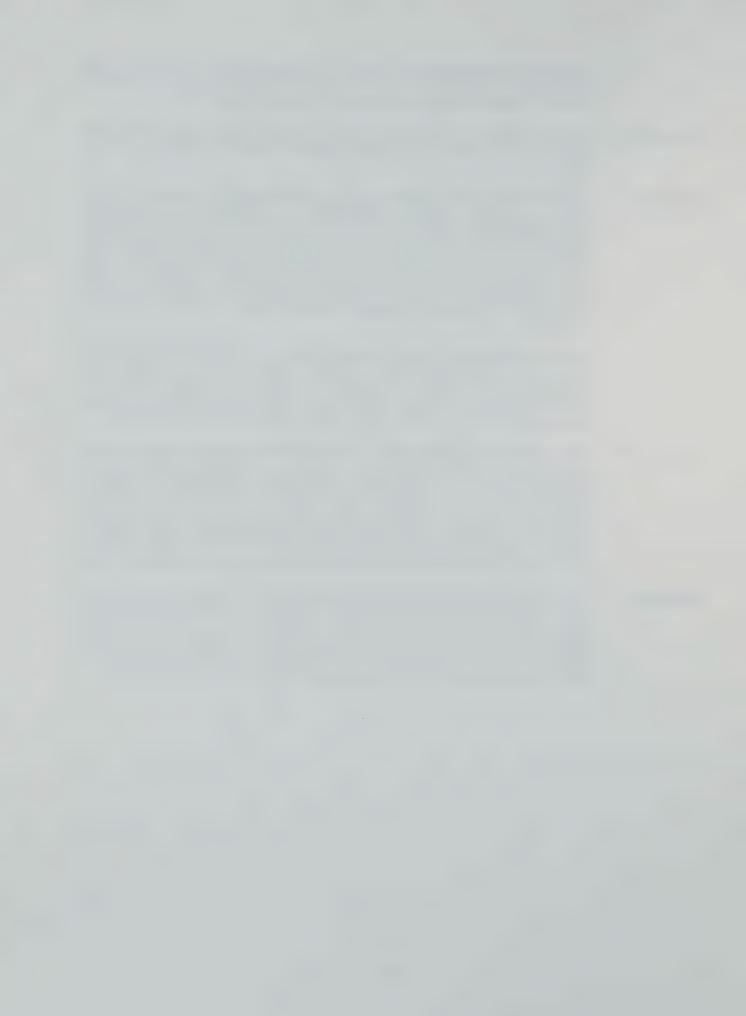
Design specifications for the Transitway catenary system will be established to accommodate the operation of trucks and heavy equipment which are needed for DPA operations. Special attention will be paid to clearances for trucks operating beneath catenary, and truck turning radii. These specifications will be reviewed with businesses operating within the DPA, as well as with the Boston Marine Industrial Park.

### Comment 50:

Tieing the mitigation of the project, to the Central Artery Project section design engineers, is not acceptable, since there is no agreed upon mitigation plan except for a verbal commitment not to allow traffic to descend below Level of Service (LOS) D. At this time, the maintenance of traffic plan promised, has not been distributed and the BSA is not inclined to believe the existence of such a document; when design issues remain unresolved. The South Boston Piers Transit project given the impacts to waterfront access and the other development going on in the area needs and must have a mitigation package which is in addition to the that offered by the Central Artery.

## Response:

To clarify, specific mitigation for any segment of the Transitway to be constructed jointly with the CA/T Project will be consistent with CA/T Project approved mitigation plans. For all other Transitway sections, the MBTA will prepare mitigation and maintenance of traffic plans as part of the final design process. This includes the section of the Transitway that will operate at surface in the DPA. Maintenance of traffic plans will be subject to review and approval by the BTD and other agencies.





BOSTON TRANSPORTATION DEPARTMENT

ONE CITY HALL PLAZA/ROOM 721 BOSTON, MASSACHUSETTS 02201 (617) 635-4680 / FAX (617) 635-4295

25 January 1994

Secretary Trudy Coxe Executive Office of Environmental Affairs 100 Cambridge Street Boston, MA 02202

Dear Secretary Coxe:

I am pleased to submit the following comments on the Final Environmental Impact Statement/Report for the South Boston Piers/Fort Point Channel Transit Project (EOEA No. 6826).

The Boston Transportation Department supports the full build alternative for the South Boston Piers Transitway. The City has targeted the Fort Point Channel area for economic growth, and the transitway, with its connections to downtown Boston and beyond, will help the area reach its full potential. And the extension to Boylston, projected for completion in 2008, will create an important link in the City's transit network, especially upon completion of the connection to Washington Street Replacement Service.

Because of the need to coordinate construction with the Central Artery project in Dewey Square, we believe that the project should be allowed to move forward in this critical corridor.

However, we have a number of questions and concerns about other aspects of the project that still must be addressed as the MBTA moves into final design and engineering.

# New England Seafood Center

The MBTA has not made a final decision about the New England
51 Seafood Center. We believe that relocating this facility within
the Fort Point Channel area would be the most appropriate decision
for two reasons.

18 m

THOMAS M. MENINO, Mayor RINA CUTLER, Commissioner



First, moving the building would allow the City to implement the community-based master plan for this area by completing New Congress Street. Second, we are concerned that MBTA construction in this area could severely affect this facility, by disrupting operations and restricting truck access. Relocating these businesses would ensure their continued viability and, as such, be the most efficient and effective way to mitigate construction impacts on these sensitive uses. We urge the MBTA to work with the City and other appropriate parties to resolve this issue.

# Courthouse Station

52 The MBTA has proposed locating the main entrances to the Courthouse Station at Farnsworth Street. Since Farnsworth Street is not currently intended to carry vehicles north of New Northern Avenue, this entrance will be situated mid-block, between signalized intersections at Sleeper and Pittsburgh Streets.

We are concerned that transit passengers will cross New Northern Avenue at this mid-block location, which presents a public safety issue. The proposed station design, with an underground mezzanine, will mitigate this problem somewhat, but we recommend that the MBTA evaluate the feasibility of locating headhouses at the signalized crossings at Pittsburgh or Sleeper Streets to improve pedestrian safety in this area.

# Financial feasibility

Because of increases in project costs, the federal share of funding is projected to cover 64 percent of costs rather than 80 percent, as originally anticipated. If the MBTA is not able to secure additional federal funds in the proposed ISTEA technical correction bill, then the "implementation schedule will be extended commensurate the with state's ability to secure alternative sources of funding."

The City shares the MBTA's concerns about increasing project costs and will be happy to support the MBTA in its efforts to secure additional federal funding for this worthy project. However, we are concerned about the impacts of project delays, should these efforts not be successful. The MBTA should provide more information about possible changes to the implementation schedule in the event of funding constraints.

# Joint construction

The MBTA is working to take advantage of joint construction with the Central Artery project in Dewey Square. We encourage the MBTA to continue meeting with the City, the Massachusetts Highway Department, and their contractors to review construction methods and opportunities to implement additional cost savings.



Secretary Coxe Page 3

# Traffic

The FEIS/R shows continuing traffic problems in South Boston at the intersection of D Street and the Massport Haul Road. The City has been reviewing operations at this intersection, and we recommend that the MBTA meet with the Massachusetts Highway Department, Massport, and BTD to explore alternative circulation patterns in this location.

# Bus/TSM alternative

- The MBTA has proposed creating a bus lane on New Congress Street as part of the Bus/TSM alternative. In order to preserve on-street parking, the MBTA proposes creating angle parking along the median. As we said in our January 8, 1993, comment letter, angle parking is not an acceptable option because of the safety hazards it introduces. The FEIR/S did not respond to this concern.
- The MBTA proposes to establish a bus pullout area on Oak Street near New England Medical Center. Although we asked for additional information in our January 8, 1993, comment letter, the FEIS/R does not provide any additional information.

# North Station shuttle

The MBTA proposes a North Station shuttle bus in the interim service plan. According to the FEIR, the bus would travel to the Piers area along Congress Street and return via Washington and Cambridge Streets. The circuitous return trip appears to be designed to enable the MBTA to serve the State station on the Blue and Orange Lines. However, as part of the Blue Line modernization project, the MBTA will have new headhouses for this station at State and Congress Streets, which would allow the bus to travel on Congress Street for its inbound and outbound trips. The MBTA should evaluate alternative routes for this shuttle.

# Catenary

- The MBTA should ensure that the catenary in the Fort Point Channel area can be integrated with the needs of local industrial uses in the area. In particular, the MBTA should work closely with representatives of the Boston Marine Industrial Park to ensure that catenary does not interfere with the need to move heavy industrial equipment.
- In the long-term, the MBTA proposes to convert the Route 7 local bus to a trackless trolley service. The MBTA should work closely with the City and the residential community to ensure that this project is sensitive to community concerns. Since this change will not take place for more than 10 years, the MBTA should also continue to explore new technologies that might allow equivalent service without requiring catenary.



# Boylston Station

The MBTA proposes completing connections to Boylston by 2008. The link between Boylston and South Station, with connections between the Transitway and Washington Street Replacement Service, will have major benefits for the regional transit system, and we urge the MBTA to make every effort to secure sufficient funding to proceed with this project in a timely fashion.

# Response to comments

The "Response to Comments Appendix" should have reprinted comment letters in their entirety rather than quote excerpts selectively. This format does not allow reviewers to read comments in their original context. In addition, it is impossible to tell whether all comments have been addressed without the original letter. For example, in the BTD comment letter of January 8, 1993, we raised questions about a bus lane on New Congress Street and a pullover area on Oak Street near New England Medical Center. The MBTA did not acknowledge these concerns in the FEIR.

# Conclusions

The South Boston Piers Transitway Project shows the strong relationship between transit service and economic development. By serving passengers with destinations in the Piers area, the full-build alternative will help support economic development in this important area of the City. The project deserves your strong support.

Thank you for this opportunity to comment.

Sincerely,

William J Good, III Acting Commissioner

cc: Mary Beth Mello

WJG:SB 9747T





BOSTON
TRANSPORTATION
DEPARTMENT

ONE CITY HALL PLAZA/ROOM 721 BOSTON, MASSACHUSETTS 02201 (617) 635-4680 / FAX (617) 635-4295

8 January 1994

RECEIVED

Secretary Trudy Coxe
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Dear Secretary loxe:

These comments will supplement the letter from the Boston Transportation Department dated January 28 regarding the Final Environmental Impact Statement/Report for the South Boston Piers/Fort Point Channel Transit Project (EOEA No. 6826).

As you know, the Massachusetts Highway Department (MHD) is building New Northern Avenue in connection with construction of the New Northern Avenue Bridge. Because Transitway construction will follow the road work, MHD is not incorporating all final design elements and amenities into the construction of New Northern Avenue.

The MBTA should work with MHD and the City to coordinate final construction work on New Northern Avenue as part of the Transitway project. It is important to ensure that final restoration includes all amenities and design elements consistent with the master plan for the Fort Point Channel area.

Thank you for this opportunity to comment:

Sincerely,

William H. Good, III Acting Commissioner

9747T WJG:SB

THOMAS MEMINO, Mayor RINA CUTTED Controls shoper



# **Boston Transportation Department**

#### Comment 51:

We believe that relocating the New England Seafood Center within the Fort Point Channel area would be the most appropriate decision for two reasons. First, moving the building would allow the City to implement the community-based master plan for this area by completing New Congress Street. Second, we are concerned that MBTA construction in this area could severely affect this facility, by disrupting operations and restricting truck access. Relocation of these businesses would ensure their continued viability and, as such, be the most efficient and effective way to mitigate construction impacts on these sensitive uses.

### Response:

The New England Seafood Center is located on a 4.4-acre parcel at 145 Northern Avenue and is bordered by the East Service Road on the west, B Street on the east, and Congress Street (and the proposed New Congress Street) on the south. The land and building are owned by eight partners of the Massachusetts partnership known as the New England Seafood Center Associates.

The Center consists of a brick and concrete structure containing fish processing and wholesale distribution companies, as well as a nightclub in the northernmost portion of the building. The building contains approximately 85,600 square feet and was built in two sections. The section that fronts on Northern Avenue was constructed in 1954, and the rear portion was constructed in 1970.

The building has loading docks on the east, west, and south sides. Truck access is maintained around the entire building. The non-fish tenant, the nightclub known as "Polly-Estas," also has a loading dock where beverages are handled. All loading docks required for fish processing require refrigeration. The portion of the lot that is not utilized by either the building, access ways, or loading docks is occupied by parking spaces used by employees and occasional visitors. In the evening, the lot is also used by patrons of the nightclub.

Two options have been considered relative to the construction of the Transitway Project through the New England Seafood Center property. These include acquiring the Seafood Center and subsequently demolishing it during construction, or structurally underpinning the building and constructing the Transitway tunnel beneath it. Although the building does not lie within the South Boston Designated Port Area (DPA), it does lie within Chapter 91 jurisdictional boundaries. Acquisition and demolition of the building would therefore require the relocation of all tenants. Additionally, building demolition would result in an expansion of the anticipated area of construction-related disruption and an increase in the project-related volume of demolition wastes. Underpinning would not require the relocation of tenants and would avoid the associated impacts of building demolition.

Upon completion of the project's FEIS/FEIR, the MBTA further investigated two options for the New England Seafood Center, working closely with agencies such as the Massachusetts Port Authority (Massport), Massachusetts Highway Department (MHD) and the CA/T Project, Boston Transportation Department (BTD), Boston Redevelopment Authority (BRA), and Economic Development and Industrial Corporation (EDIC), as well as with the Seafood Center owners and occupants. Issues regarding future land uses, roadway improvements, construction schedules, and costs were discussed and evaluated. Since this coordination effort did not result in an acquisition plan that was acceptable to all parties, the MBTA proposes to



underpin, rather than acquire, the New England Seafood Center. Underpinning, which will not require the relocation of Seafood Center tenants, is technically feasible and is less expensive than an acquisition.

The MBTA recognizes that construction of the Transitway tunnel will require coordination with a number of parties, including area property owners, adjacent businesses, and nearby construction projects. A conceptual design for the proposed underpinning of the Seafood Center consists of jacking pipepiles under the existing foundation and constructing steel framing for support of the building. This method requires jacking and receiving pits on the east and west sides of the building, which must be accessible to the surface. All other work will occur underground and will have little or no effect on the structure during and upon completion of construction. During construction, access to the jacking and receiving pits will require close coordination with the Seafood Center tenants to ensure adequate loading dock space, access around the site, maintenance of power for refrigeration, and parking. Any potential disruption of operations during MBTA construction will require mitigation by the MBTA. The MBTA will work with tenants of the Seafood Center, the CA/T Project, and other adjacent projects as the underpinning scheme is designed to further identify impacts and mitigation. Maintenance of traffic plans during underpinning of the Seafood Center by the MBTA will consider such mitigation measures as accommodation of Center truck traffic in adjacent streets, construction during nighttime hours, off-site parking, and loading area reconfiguration. These maintenance of traffic plans will be coordinated with any plans approved for the CA/T Project.

## Comment 52:

The MBTA has proposed locating the main entrances to the Courthouse Station at Farnsworth Street. We are concerned that transit passengers will cross New Northern Avenue at this mid-block location, which presents a public safety issue. The proposed station design, with an under ground mezzanine, will mitigate this problem somewhat, but we recommend that the MBTA evaluate the feasibility of locating headhouses at the signalized crossings at Pittsburgh or Sleeper Streets to improve pedestrian safety in this area.

### Response:

The MBTA has met with public agencies, including the BTD, BRA, MHD, and the General Services Administration, and private interests, such as the McCourt-Broderick Limited Partnership and the Children's Museum, to address concerns about Courthouse Station as documented in comment letters submitted on the project's FEIS/FEIR. Issues discussed with these public and private interests include safety, pedestrian access, and future development in the Piers area. After consideration of the various concerns and competing interests identified and discussed in these meetings, the MBTA has determined that the location of the Courthouse Station, including the headhouses as proposed in the FEIS/FEIR, is appropriate, and should not be changed. However, other mitigation measures to address concerns expressed during meetings with public and private interests will be implemented. These measures are discussed later in this section, following a brief description of the rationale for the proposed Courthouse Station siting decision.

The two Piers area Transitway stations – Courthouse and World Trade Center Stations – were sited to provide maximum transit coverage of the area. These stations were sited by the MBTA with input from state and city planners, including the BRA and Massport, as well as from Piers area property owners and developers.

Alternative locations for Courthouse Station at Sleeper and Pittsburgh Streets were considered during station siting. Neither of these locations is as advantageous as the proposed Farnsworth Street location. Of primary importance is that the Courthouse



Station be as close as possible to the new Federal Courthouse. The proposed Farnsworth Street location is directly opposite (although a block away from) the main entrance of the Courthouse. Although a Courthouse Station shifted west to Sleeper Street would be dramatically sited on the waterfront, engineering for such a shift is not feasible for a number of reasons.

Specifically, the proposed Courthouse Station platforms are located on a tangent (i.e., straight) section. Moving the station west would place the platforms on a curve. Since a tangent section is required for station platforms, the Transitway alignment west of Sleeper Street would need to be redesigned. Such a realignment is not feasible, however, since it would result in an adverse impact to the abutment of the New Northern Avenue Bridge. Alternatively, the current proposed platform location could be maintained, and the headhouses relocated to Sleeper Street. This extension of the accessways to Courthouse Station would result in a much larger and more costly station. Furthermore, the construction of the New Northern Avenue Bridge immediately adjacent to Sleeper Street headhouses would pose safety problems for transit passengers entering or exiting the station. Cars coming off the incline of the New Northern Avenue Bridge will reach grade at the intersection of Sleeper Street and New Northern Avenue. As cars come down the incline, they are likely to be accelerating. Similarly, as motorists approach the bridge incline, their natural instinct would be to accelerate. The safety of Transitway station users and other pedestrians could be jeopardized by the six lanes of accelerating traffic and motorists with poor sight lines at the intersection of Sleeper Street and New Northern Avenue.

A station location at Pittsburgh Street would be located too far from the Federal Courthouse, existing development along the western edge of the Fort Point Channel, and a potential future water shuttle terminal at Fan Pier. It is desirable from both wayfinding and urban design perspectives that the headhouses be as close as possible to, and visible from, the channel and the Fan Pier. Along with the future Federal Courthouse, these are two of the Piers area's strongest geographical features.

The Courthouse Station location at the western edge of the Piers area was chosen specifically to serve existing developments, including Museum Wharf (consisting of the Children's Museum, Computer Museum, and Boston Tea Party Ship Museum) and the Boston Wharf Company. Approximately one-third of existing development in the Piers area is focused there. This development consists primarily of office uses, which generate a high level of trip demand per square foot of development.

A one-quarter mile walk radius was used to analyze station locations with respect to their ability to serve area development. To avoid overlap of these radii and maximize the cost-effectiveness of the project, the two stations were spaced roughly one-half mile apart. The northwest entrance to Courthouse Station is located across from the new Federal Courthouse at Fan Pier (within a two-minute walk distance), and a southwest entrance provides access to the Boston Wharf Company buildings and to Museum Wharf. Using a one-quarter mile walk distance, Courthouse Station will also serve developments in the easternmost portion of the Financial District, including International Place.

In their comments on the Transitway's Draft Environmental Impact Report, officials from the Computer Museum stressed that the Courthouse Station should remain as close to Museum Wharf as possible. Museum Wharf currently attracts over a million visitors each year, and museum directors believe that convenient, accessible transit is likely to capture a considerable portion of these visitors and Museum staff if the service meets their needs. Needs include a short walk distance from the Transitway station,



and easily accessible vehicles that can accommodate strollers, baby carriages, and wheelchairs. Future transportation developments, such as water shuttle services expected to dock at Fan Pier, and the existing Northern Avenue Bridge, which is proposed for conversion as an enhanced pedestrian walkway, would also be well-served by station headhouses in the vicinity of Farnsworth Street.

Based on these factors, the MBTA believes that the Piers area would be ill-served by a relocation of Courthouse Station. While the MBTA recognizes that pedestrian safety is of paramount concern given the midblock location of station headhouses in the vicinity of Farnsworth Street, such headhouse locations have been successful elsewhere in the MBTA system. For example, the Kendall and Kenmore Stations are at mid-block locations. Easy access to these stations is achieved in several ways. At Kenmore Station, headhouses on either side of Commonwealth Avenue lead to a mezzanine, while passengers accessing Kendall Station are eased across the highly defined mid-block crossing by flags set into the median of Main Street in Cambridge and a pedestrian actuated signal.

As described in the FEIS/FEIR, Courthouse Station will be designed with a mezzanine accessible from both sides of New Northern Avenue. Other mitigation measures that the MBTA commits to implement with approval from such agencies as the BTD include the following:

- Courthouse Station entrance/exit at Pittsburgh Street. The headhouse located at the southeastern corner of New Northern Avenue and Pittsburgh Street will be open as a Courthouse Station entrance/exit. Previously, this headhouse was designated as an emergency exit only, with the main station entrance/exit headhouses located on both sides of New Northern Avenue in the vicinity of Farnsworth Street. The designation of all three headhouses for station entrance/exit will improve pedestrian circulation at Courthouse Station, and will now allow pedestrians to access the station at the New Northern Avenue/Pittsburgh Street signalized intersection.
- Installation of a barrier. A fence or other barrier along the New Northern Avenue median would prevent mid-block crossings. The current median plan for New Northern Avenue does not provide for any such barrier. The MBTA will work with other agencies, such as the BRA, on the final landscaping plan for the New Northern Avenue median. In combination with a median barrier, a pedestrian actuated signal could be installed at the midblock headhouse location. A change in the color and material of the crossing could also be provided to alert motorists that this is a pedestrian crossing. At a minimum, the crosswalk striping here should be very wide so motorists have a strong visual cue that crossings may occur.
- Clear signage and graphics. Provision of clear signage and graphics both at the station level underground and at the street level will greatly facilitate communication with pedestrians. Prominent below level signage will direct exiting passengers to the appropriate side of New Northern Avenue so they can reach their destinations without crossing the street at the surface. Headhouses at street level will be marked by a strong and highly visible design. It is also the intention of the MBTA to have a community relations person in the station to answer questions and direct station users to destinations in the Piers area.
- Comment 53: The MBTA should provide more information about possible changes to the implementation schedule in the event of funding constraints.



### Response:

The MBTA has no intention of altering the Transitway implementation schedule as it is presented in the FEIS/FEIR. The initial build phase of the Transitway from South Station to the World Trade Center is expected to be open for revenue service in the year 2000, with extension to Boylston Station scheduled for completion by 2008.

As noted in the FEIS/FEIR, however, federal funds totaling \$278 million as currently authorized in ISTEA cover approximately 64 percent of the Transitway initial build capital costs. The MBTA, with Congressional support, submitted a request in January 1994 for an additional \$72.7 million in federal authorization for the project. These additional dollars will bring the total ISTEA authorization to 80 percent of Transitway initial build capital costs. In the event that authorization of federal funds is delayed, the MBTA will make up the shortfall; no reduction in the scope of the initial build project would result.

Given the high level of federal funding for the initial build segment and the aggressive schedule for opening of revenue service in the year 2000, no alternative financing mechanisms are anticipated for the initial build Transitway. Such mechanisms may be more appropriate for extension of the Transitway to Boylston Station in the project's full build configuration.

To date, no federal dollars have been authorized by Congress for the full build segment of the Transitway extending from South Station to Boylston Station. The schedule for this segment anticipates design beginning in the year 2000, with construction starting in 2003. The MBTA will work with its Congressional delegation to secure federal funds for this concluding segment of the Transitway Project; 80 percent federal participation will be sought. In addition, the MBTA will continue to pursue alternative sources of funding for the project; such as joint development with midtown development parcels (for example, Lafayette Place II and Parcel 30/Keith Block); privatization of certain project elements; and alternative financing arrangements, such as certificates of participation.

#### Comment 54:

The FEIS/R shows continuing traffic problems in South Boston at the intersection of D Street and the Massport Haul Road. The City has been reviewing operations at this intersection, and we recommend that the MBTA meet with the Massachusetts Highway Department, Massport, and BTD to explore alternative circulation patterns in this location.

# Response:

As requested, the MBTA has met with the BTD, Massport, and the MHD to explore alternative circulation patterns in the vicinity of D Street and Massport Haul Road. In the South Boston Piers Transit Project's FEIS/FEIR, the intersection of D Street and Massport Haul Road was shown to operate at level of service (LOS) E in the initial build Transitway only. The LOS E rating, which does not indicate an intersection failure, is due in part to the operation of surface shuttle buses needed in the initial build Transitway to provide connections between the Piers area and rapid transit transfer stations in midtown Boston. These shuttle buses are eliminated once the full build Transitway is extended to the Orange and Green Lines at Chinatown Station and Boylston Station, respectively, and the Massport Haul Road/D Street intersection was shown to improve to LOS D.

Since traffic analysis for the transit project's FEIS/FEIR was prepared, however, the CA/T Project has performed additional analysis of traffic circulation in the Piers area. In April 1994, the CA/T Project prepared a *South Boston Truck Access and Circulation Study* to support the project's Consolidated Chapter 91 license application. The truck study was based on the CA/T Project's Proposed Action as approved by the Secretary



of Environmental Affairs in his Certificate dated January 2, 1991, and was prepared to assist the Department of Environmental Protection (DEP) and other interested parties, including the BTD and the Boston Shipping Association (BSA), in assessing the effect of the CA/T Project on truck access to the South Boston Designated Port Area (DPA).

Through a D Street corridor analysis, the truck study documented that intersection operations were affected by the queuing of vehicles between the closely-spaced intersections of the D Street corridor, including the Transitway portal. The study proposed to mitigate these conditions by providing a grade separation of D Street and the Massport Haul Road, and by connecting Summer Street and the Massport Haul Road by a new "Pumphouse Connector Road" opposite E Street.

During the process of addressing DPA truck access issues, Federal Highway Administration (FHWA) concerns regarding the preliminary design for this area of the CA/T Project were being addressed. Resolution of the FHWA concerns resulted in proposed design refinements to the CA/T Project's Proposed Action. Accordingly, the CA/T Project initiated an amended truck study in June 1994 based on a traffic network that includes the design refinements, and also includes the two proposed mitigation measures for the D Street corridor (grade separation of D Street and Massport Haul Road and construction of the Pumphouse Connector Road). As with the April 1994 truck study, the traffic networks showing traffic volumes in the amended truck study area include the Transitway operations.

At the same time, the CA/T Project initiated an in-depth coordination process with state and city transportation agencies and interested parties on both the amended truck study and a Notice of Project Change (NPC) for the design refinements to the project. Coordination includes a series of meetings that will be ongoing during the period of preparation of both the amended truck study and the NPC. Parties invited to participate in the process include the MBTA, Massport, DEP, BTD, BRA, EDIC, BSA, and The Boston Harbor Association.

As of August 31, 1994, four coordination meetings were held, which are temporarily suspended due to the CA/T Project's consideration of further design refinements. Thus far, the scope, methodology, and network assumptions for both the amended truck study and the NPC have been discussed at these meetings. The CA/T Project is currently preparing responses to questions raised and to various participants' requests for additional traffic-related information. Sensitivity analyses are also being prepared to respond to specific issues raised during the meetings. The CA/T Project expects to resume the meetings in the near future. Future meeting agendas include review of traffic analyses and findings, and review of traffic mitigation measures and implementation requirements for both the amended truck study and the NPC.

This public process provides exceptional opportunities for the participants to share in the development of the traffic analyses for the amended truck study and the NPC, to contribute to the process of ascertaining the causes contributing to potential traffic problems, and to identify appropriate mitigation measures. The focus of the truck study and any amendments is to ensure that truck access to port areas is maintained throughout CA/T Project construction and in the full build design year of 2010. The CA/T Project construction period coincides with Transitway construction, and operations of both the Transitway and Third Harbor Tunnel will continue in the 2010 design year. Through its participation in the development of the amended truck study, the MBTA will ensure that Transitway construction impacts and operations are fully addressed, and any combined impacts are mitigated in a coordinated and effective manner. Thus, BSA and BTD concerns will be addressed through this process.



#### Comment 55:

The MBTA has proposed creating a bus lane on New Congress Street as part of the Bus/TSM alternative. In order to preserve on-street parking, the MBTA proposes creating angle parking along the median. As we said in our January 8, 1993, comment letter, angle parking is not an acceptable option because of the safety hazards it introduces. The FEIS/S did not respond to this concern.

# Response:

No angle parking on New Congress Street is contemplated as part of the Transitway Project. Angle parking on New Congress Street was proposed as part of the Bus/Transportation System Management (TSM) Alternative defined in the FEIS/FEIR. Such a parking arrangement was necessitated under this alternative as the result of the proposed construction of a bus lane on New Congress Street. To permit construction of this bus lane, curb lane parking was proposed to be moved to the median of New Congress Street and arranged in an angle configuration in order to avoid a loss in the net number of relocated spaces.

The MBTA recognizes the undesirability of a bus lane in the curb lane and angle parking along the median of New Congress Street. The BTD, BRA, and Boston Environment Department (BED) all expressed serious concerns about TSM measures deemed necessary by the MBTA as part of the Bus/TSM Alternative to support transit demand in the Piers area. In part as a result of these concerns, the MBTA rejected the Bus/TSM Alternative in favor of the full build Transitway as the locally-preferred alternative; however, the definition of the Bus/TSM Alternative was not altered in the FEIS/FEIR. The MBTA does not advocate the creation of angle parking if traffic safety is compromised. Again, angle parking is not proposed as part of Transitway Project implementation.

### Comment 56:

The MBTA proposes to establish a bus pullout area on Oak Street near New England Medical Center. Although we asked for additional information in our January 8, 1993, comment letter, the FEIS/R does not provide any additional information.

# Response:

The bus pullout lane on Oak Street as part of the Bus/TSM Alternative would require the relocation of the public sidewalk abutting a walkway area used by the Don Bosco High School. Since this alternative was rejected in favor of the Transitway, no additional analysis of the impacts of this proposed relocation was presented in the FEIS/FEIR. The MBTA has selected the Transitway for implementation; no bus pullout area on Oak Street is contemplated as part of the Transitway.

### Comment 57:

The MBTA proposes a North Station shuttle bus in the interim service plan. According the FEIR, the bus would travel to the Piers area along Congress Street and return via Washington and Cambridge Streets. The circuitous return trip appears to be designed to enable the MBTA to serve the State Station on the Blue and Orange Lines. However, as part of the Blue Line modernization project, the MBTA will have new headhouses for this station at State and Congress Streets, which would allow the bus to travel on Congress Street for its inbound and outbound trips. The MBTA should evaluate alternative routes for this shuttle.

### Response:

As described in the FEIS/FEIR, the interim service shuttle bus route from North Station will use Congress Street in the southbound direction, but would divert to Devonshire Street to provide a stop accessible to the State Station on the Orange and Blue Lines; traffic considerations would appear to preclude a shuttle bus stop on Congress Street. In the northbound direction, the route was shown to operate via Washington Street to provide a better transfer connection with the existing State Station. However, as BTD points out, the Blue Line Modernization Project will create new headhouses for State



Station on Congress Street. The MBTA agrees that, if traffic conditions permit a bus stop to be located on the northeast corner of Congress Street at State Street, that the North Station Shuttle could be routed via Congress Street (and Pearl Street on the one-way section) in the northbound direction as well. Because left turns from Atlantic Avenue to Pearl Street will not be possible until the CA/T Project is completed, the route would need to access Pearl Street via High Street, which would operate one-way in the easterly direction during the construction period. The MBTA will work with the BTD to refine this routing plan for interim bus services, which are scheduled for operation beginning in 1998 upon opening of the new Federal Courthouse.

#### Comment 58:

The MBTA should ensure that the catenary in the Fort Point Channel area can be integrated with the needs of local industrial uses in the area. In particular, the MBTA should work closely with representatives of the Boston Marine Industrial Park to ensure that catenary does not interfere with the need to move heavy industrial equipment.

### Response:

The Transitway's surface catenary system will be designed in conjunction with other streetscape elements in the South Boston Piers area. The MBTA is currently working with the South Boston Streetscape Committee which has been convened to develop a design for the Piers area's streetscape; committee members include representatives from the City of Boston, Massport, and CA/T Project. The MBTA will integrate design of the catenary system associated with surface operation of Transitway trackless trolley vehicles with the area's streetscape elements, including lighting, trees, and signage. This integration will ensure compatibility and cohesion of the area's streetscape.

Design specifications for the Transitway catenary system will be established to accommodate the operation of trucks and heavy equipment on surface streets. The special requirements of the Boston Marine Industrial Park (BMIP), which involve the operation of cranes and other heavy equipment associated with maritime industries, will require particular attention as design specifications are developed. The MBTA will coordinate with BMIP both on development of catenary specifications and on final design of the surface catenary system.

#### Comment 59:

In the long term, the MBTA proposes to convert the Route 7 local bus to a trackless trolley service. The MBTA should work closely with the city and the residential community to ensure that this project is sensitive to community concerns. Since this change will not take place for more than 10 years, the MBTA should also continue to explore new technologies that might allow equivalent service without requiring catenary.

#### Response:

Overhead catenary on South Boston neighborhood streets will be designed to be consistent with the scale and residential character of the area. However, the potential exists that an alternative, non-catenary, propulsion system may be available for this residential South Boston route expected to be in revenue service by 2008. The MBTA will evaluate any appropriate new technology as design on this segment of the Transitway is advanced. In addition, the MBTA will work with the South Boston residential community as design of the surface route progresses.

#### Comment 60:

The MBTA proposes completing connections to Boylston by 2008. The link between Boylston and South Station, with connections between the Transitway and Washington Street Replacement Service, will have major benefits for the regional transit system, and we urge the MBTA to make every effort to secure sufficient funding to proceed with this project in a timely fashion.



#### Response:

To date, no federal dollars have been authorized by Congress for the full build segment of the Transitway extending from South Station to Boylston Station. The schedule for this segment anticipates design work beginning in the year 2000, with a construction start in 2003. The MBTA will work with its Congressional delegation to secure federal funds for this segment of the Transitway Project; 80 percent federal participation will be sought. In addition, the MBTA will continue to pursue alternative sources of funding for the project such as joint development with midtown development parcels (for example, Lafayette Place II and Parcel 30/Keith Block); privatization of certain project elements; and alternative financing arrangements, such as certificates of participation.

#### Comment 61:

The "Response to Comments Appendix" should have reprinted comment letters in their entirety rather than quote excerpts selectively. This format does not allow reviewers to read comments in their original context.

#### Response:

In this Draft Section 61 Finding, comment letters received on the FEIS/FEIR are reprinted in their entirety.

#### Comment 62:

The MBTA should work with the MHD and the City to coordinate final construction work on New Northern Avenue as part of the Transitway project. It is important to ensure that final restoration includes all amenities and design elements consistent with the master plan for the Fort Point Channel area.

#### Response:

The MBTA commits to work with MHD and the City to restore New Northern Avenue to its condition prior to initiation of the Transitway work. In addition, the MBTA will work with MHD and City agencies to develop a permanent landscaping plan for the avenue. If this plan has been established prior to completion of Transitway construction work beneath New Northern Avenue, it will be implemented as part of the MBTA's restoration work.



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February 9, 1993

Trudy Coxe, Secretary
Executive Office of Environmental Affairs
MEPA Unit - EOEA #6826
100 Cambridge Street
Boston, MA 02202

Re: South Boston Piers/Fort Point Channel Transit Project (EOEA #6826)

Dear Secretary Coxe:

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The Conservation Law Foundation (CLF) has reviewed the Final Environmental Impact Report (FEIR) for the South Boston Piers/Fort Point Channel Project. This project is one of the transit improvements required under 310 CMR 7.36(2) and the 1990 Memorandum of Understanding signed by EOTC, DPW and CLF. It presents a unique opportunity to demonstrate that a sustainable transportation system is needed to maximize economic development in a metropolitan area.

The FEIR concludes that the preferred project alternative is a 1.5 mile underground transit tunnel from Boylston Station to the World Trade Center combined with surface bus operations. This alternative would link new development in the South Boston Piers area with the Red, Orange and Green Lines, and commuter and intercity rail in downtown Boston. CLF supports the development of a transit-oriented transportation system, and therefore supports this project. Nevertheless, we ask that the following concerns be addressed in the certificate for this project.

1. The final project design must be compatible with the project plans for the Central Artery Third Harbor Tunnel (CA/T) and the North-South Station Rail Link Project.

The FEIR proposes changes to the transitway's alignment. Instead of turning eastward at the CA/T project's vent building number three, the transitway tunnel is to turn eastward from Atlantic Avenue at Congress Street. This change was made necessary by refinements to the northbound Central Artery's design and restriction of the alignment by one of the vent building structures. (FEIR, p. ES-5)

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CLF supports continued coordination of these two projects, but strongly urges the MBTA also to coordinate the transitway project with the North-South Station Rail Link. Like the Transitway, this project faces funding challenges, yet is critical to creating an efficient and sustainable transportation system. Moreover, it would allow many more people to travel conveniently to the Piers area by public transit. The DEIR recognizes North Station as an "important gateway for regional commuters" to the area and proposes a "frequent shuttle bus service between North Station and the Piers area" in all the (DEIR, p. 4-37) With the rail link, this shuttle alternatives. bus service would become unnecessary in the full-build alternative. Commuter rail passengers from north of the city would be able to travel through to South Station and change to the transitway to reach the Piers area. The rail link would help prevent possible congestion due to buses (see DEIR, p. 5-25) and help realize the "boulevard atmosphere" that is being sought for the area. Thus, the project design for the transitway should not preclude construction of the rail link. (See Central Artery Rail Link Task Force, "Building for an Intermodal Future: The North-South Rail Link" (May 1993))

2. The project should provide the spine for transitoriented development in the South Boston Piers area, and all development in the area should be integrated with the transitway.

Under the revised transitway tunnel alignment, the tunnel and courthouse station will be located completely beneath the right of way limits of New Northern Avenue. The DEIR cites the Central Artery/Third Harbor Tunnel Project's estimate that "the largest concentrations of commercial space are projected to be along Congress Street and Northern Avenue." (DEIR, p. 4-37) Moreover, Congress Street is viewed as "the spine of Financial District expansion in the Piers area by the BRA in its Fort Point Channel District Plan." (DEIR, p. 4-37) These projections are consistent with a transit-oriented development approach. urges all of the government agencies involved in the project to encourage and, where possible, require that development cluster around transit stations and along transit routes. A serious and sustained effort is critical because projections for the year 2010 show that around 60% of daily trips into the Piers area will still be made by automobile, even if the full build alternative is in place. (DEIR, p. 4-22) Thus, all steps to make transit more attractive and convenient to visitors, customers and commuters must be taken. Ensuring that development is located near transit stations is one of the most significant.



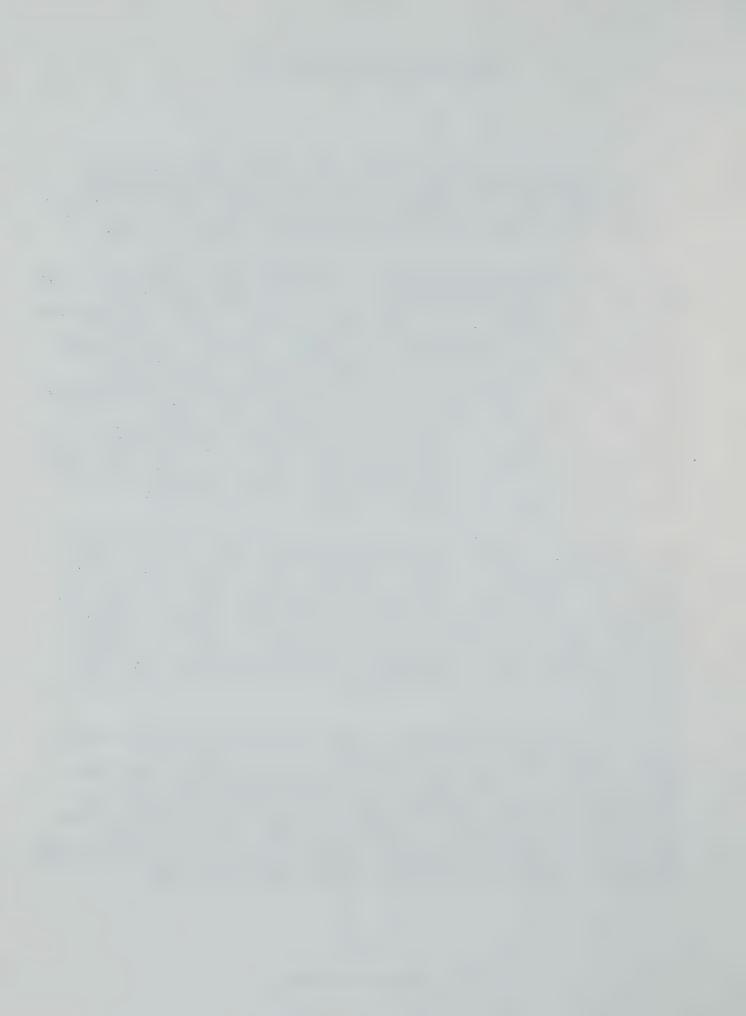
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3. Because completion of the full build alternative is essential to realizing the Piers area's full development potential and to avoiding adverse impacts on the surrounding area, joint development should be explored actively by the MBTA as an alternative to questionable federal funding.

Financing for the transitway is somewhat uncertain. Assuming 80% federal funding and an average annual increase of no more than 5.1% in state assistance, the DEIR projects that sufficient revenues will be available to finance the construction and operation of the full build alternative. (DEIR, p. ES-27) The Federal Transit Administration (FTA), however, has advised the MBTA that the \$278 million, earmarked for the project in ISTEA, may not be available over the planned implementation period (DEIR, p. ES-27), and actual appropriations in past years have been less than the amounts authorized under ISTEA. (DEIR, p. 6-9) Finally, the revised alignment and implementation schedule have made the project more expensive, and therefore the percentage of project costs covered by the \$278 million is lower than originally anticipated. (DEIR, p. 6-8) The DEIR indicates that lack of funds may require a delay in the project's construction schedule. (DEIR, p. 6-9)

Delays in the full build transitway's construction schedule will adversely affect Chinatown's neighborhoods and will result in significant traffic congestion, at least in the high growth scenario. (DEIR, p. ES-22) Moreover, the congestion may lessen the development potential of the Piers area. To prevent delays in the construction schedule and the attendant adverse effects, CLF urges the government agencies to pursue actively "private sector funding mechanisms," such as joint development. (DEIR, p. 6-9) Joint development, properly carried out, can result in the type of clustering of businesses that is desirable

A full build alternative and two minimum operable segment (MOS) alternatives were considered for the underground transitway. While the MOS alternatives are shorter versions of the full build transitway and could be implemented on an incremental basis, the DEIR finds that negative impacts are anticipated on Chinatown's streets in the two MOS alternatives and the bus alternative. (DEIR, p. ES-22) The no action alternative would likely preclude much of the development planned for the Piers area. (DEIR, p. ES-19) These findings make timely progress towards the full build alternative essential.



for this area. (See attached letter)

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5. Of the two construction methodologies being considered for crossing the Fort Point Channel, the half-channel cofferdam method seems preferable.

The DEIR states that the half-channel cofferdam method and the modified sunken tube method are being considered for crossing the Fort Point Channel. (DEIR, p. 5-53) Perhaps the primary concern in the construction of the crossing is dispersion of sediment particles. Disturbance of sediments will adversely affect the marine environment by increasing turbidity and releasing contaminants formerly fixed in place on the channel floor.

Under the sunken tube method, the excavation area would only be semi-confined. Closing clamshell dredge buckets and silt curtains are suggested as possible measures to mitigate the impacts of increased suspended solids. Based on recent observations of dredging operations at the Moran Terminal, the effectiveness of these measures is questionable. Under the cofferdam method, the excavation is completely confined. As a result, the flow characteristics of the channel may be more affected than under the sunken tube method. Nevertheless, this impact seems preferable to the greater risk of dispersion posed by the sunken tube method.

Finally, CLF requests as a permit condition that all water removed from the channel or from sediments during the dewatering process be treated to an appropriate specification before it is returned to the channel. Detention in portable tanks on land prior to discharge will likely be insufficient for treatment purposes given the presence of contaminated sediments. (See DEIR, p. 5-54, 5-56)

Thank you for your consideration of these comments.

Sincerely,

Veronika Thiebach Staff Attorney

cc: Mary Ainsley, MBTA Mary Beth Mello, FTA

4



Comment 63:

The final project design must be compatible with the project plans for the Central Artery Third Harbor Tunnel (CA/T) and the North-South Station Rail Link Project.

Response:

The South Boston Piers Transitway and its early construction contract at Dewey Square will have no impact on and is fully compatible with the North Station-South Station Rail Link as currently proposed. The current proposed plan shows that the Rail Link will be constructed beneath the depressed Central Artery box, and the Transitway will be constructed above the Central Artery box. Construction of the Transitway in Dewey Square as part of the CA/T Project's C11A1 construction contract will not foreclose future opportunities for the Rail Link. Additional measures discussed with the Atlantic Avenue Abutters Group to improve access during construction will be included as part of the C11A1 contract documents. These measures, which are contained in the Agreement Between the Massachusetts Highway Department and the Atlantic Avenue Abutters Group as to Goals for Construction Period Maintenance of Pedestrian and Vehicular Environment, will be implemented by the contractor during construction if feasible.

Comment 64:

The project should provide the spine for transit-oriented development in the South Boston Piers area, and all development in the area should be integrated with the Transitway... CLF urges all of the government agencies involved in the project to encourage and, where possible, require that development cluster around transit stations and along transit routes.

Response:

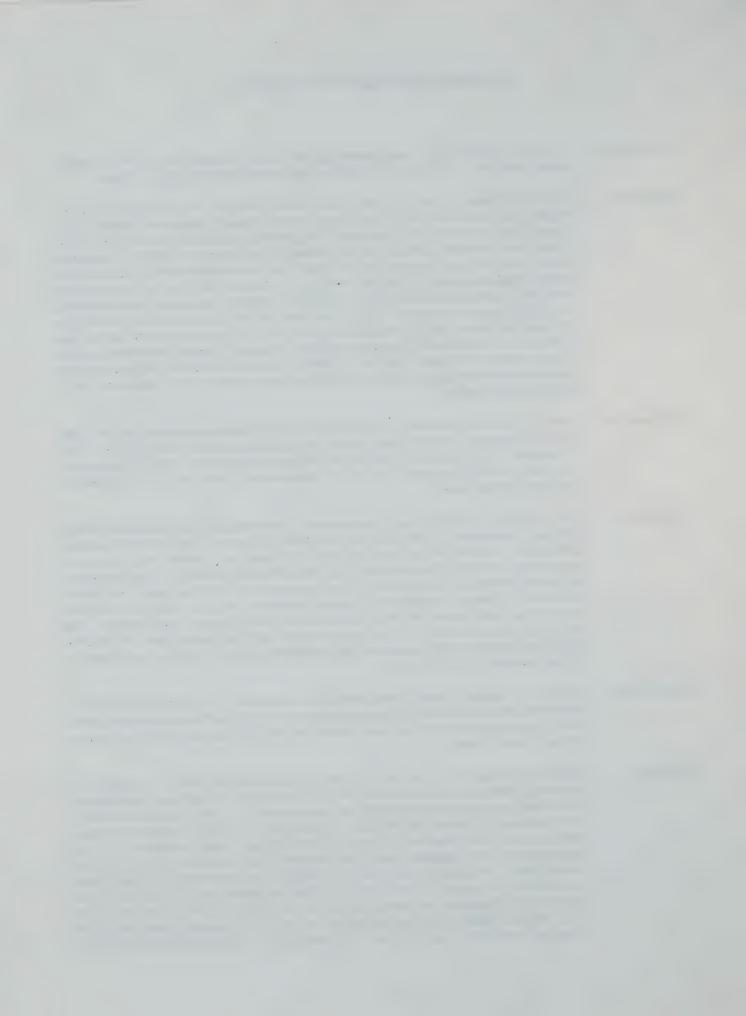
The Transitway Project has been planned within the context of the Fort Point Citizens Advisory Committee and Boston Redevelopment Authority's (BRA) master planning document, the *Fort Point District Plan*. This plan recognizes that improved transportation infrastructure, including a transit component, is the key to unlocking the economic potential of the Piers area. The Transitway has been designed to fully serve projected trip demand in the Piers area, and Transitway stations in the South Boston Piers have been located in areas where zoning allows dense development. The MBTA strongly endorses transit-oriented development, and also urges that the BRA and other planning agencies encourage development patterns that are supported by and supportive of transit services.

Comment 65:

Because completion of the full build alternative is essential to realizing the Piers area's full development potential and to avoiding adverse impacts on the surrounding area, joint development should be explored actively by the MBTA as an alternative to questionable federal funding.

Response:

The MBTA agrees that completion of the Transitway is essential to realizing the economic potential of the Piers area and, for this reason, has selected the full build Transitway as its preferred alternative for implementation. In the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, \$278 million of federal funds were authorized for the Transitway Project. These federal funds are earmarked for construction of the Transitway initial build segment from South Station to the World Trade Center. As noted in the FEIS/FEIR, federal funds currently authorized cover approximately 64 percent of the Transitway initial build capital costs. The MBTA, with Congressional support, submitted a request in January 1994 for an additional \$72.7 million in federal funds authorized for the project. These additional dollars will bring the total ISTEA authorization to 80 percent of Transitway initial build capital



costs. In the event that federal funds are delayed, the state could assume an increased share until such time as federal funds become available.

Given the high level of federal funding for the initial build segment and the aggressive schedule for opening of revenue service in the year 2000, no alternative financing mechanisms are anticipated for the initial build Transitway. Such mechanisms may be more appropriate for extension of the Transitway to Boylston Station in the project's full build configuration.

To date, no federal dollars have been authorized by Congress for the full build segment of the Transitway extending from South Station to Boylston Station. The schedule for this segment anticipates design work beginning in the year 2000, with a construction start in 2003. The MBTA will work with its Congressional delegation to secure federal funds for this segment of the Transitway Project; 80 percent federal participation will be sought. In addition, the MBTA will continue to pursue alternative sources of funding for the project, such as joint development with midtown development parcels (for example, Lafayette Place II and Parcel 30/Keith Block); privatization of certain project elements; and alternative financing arrangements, such as certificates of participation.

Comment 66:

Of the two construction methodologies being considered for crossing the Fort Point Channel, the half-channel cofferdam method seems preferable.

Response:

The MBTA has met with the U.S. Army Corps of Engineers (USACOE), Massachusetts Coastal Zone Management (MCZM), Department of Environmental Protection (DEP), and the Conservation Law Foundation to discuss the Fort Point Channel crossing construction methods. Based on these meetings and analysis of both the immersed tube and cofferdam construction methods, the MBTA has selected the semi-confined concrete immersed tube construction method over the cofferdam as the preferred alternative for the crossing of the Fort Point Channel. This method minimizes total construction duration, in-water construction duration, and costs, and enhances the ability to successfully mitigate environmental impacts. Specifically, the semi-confined concrete immersed tube can be constructed 11 to 13 months faster than the cofferdam; has a 30-week, versus a 68-week, in-water construction period; is estimated to cost \$3.5 million less than the cofferdam method; and can be constructed in an environmentally sound manner, as discussed below. In addition, the use of semi-confined dredging techniques will limit dredged material volumes to amounts similar to those resulting from the cofferdam method.

Immersed tube construction involves channel dredging within a semi-confined area. Two parallel rows of steel sheeting will be driven into the channel bed along the alignment to preclude the necessity of side-sloping excavation. This sheeting will extend approximately six inches above the channel bottom. The channel bed between the rows of sheeting will then be excavated, or dredged, to the necessary depth. Upon proper preparation of the channel bed, a single tube section, constructed off-site and sealed at each end, will be floated into position over the dredged alignment and lowered (or "sunk") into place. Crossing of the channel will require three such sections and will result in a navigational constraint of approximately one-half the width of the channel at any given time. Upon completion of construction, the tunnel will be covered with clean, compatible materials.

The cofferdam construction method differs from the immersed tube method in that all construction would occur in place. This method would have entailed installation of a sheet pile cofferdam across one-half of the Fort Point Channel, while leaving the



remaining half of the channel open for tidal flushing and navigation. Once the cofferdam was installed, the confines of the cofferdam would be cross-braced, dewatered, and excavated to the tunnel design depth; the Transitway tube would then be cast in place. Upon completion of the first half of the channel tunnel, the cofferdam would be removed and construction of the second half of the tunnel initiated. During this process, a portion of the first cofferdam would need to remain in place to maintain continuity between the two halves of the cofferdam crossing. Upon completion of the channel crossing, sheet piles used for the cofferdam would be cut at the mud line and left in place to ensure soil stability in the immediate vicinity of the tunnel.

In accordance with USACOE requirements, Tier I (data review) and Tier II (chemical evaluation) reports have been prepared that include descriptions of the Fort Point Channel crossing construction methodologies and sequencing, existing sediment conditions, and sediment dredging and disposal requirements and alternatives. A MCZM Federal Consistency Certification Statement, USACOE Section 404 Permit Application, and Section 401 Water Quality Certification have been filed which detail the construction methodology, sequencing, impacts, and mitigation measures for the preferred crossing method. A MCZM Federal Consistency Certification Statement, USACOE Section 404 Permit Application, and Section 401 Water Quality Certification have been filed which detail the construction methodology, sequencing, impacts, and mitigation measures for the preferred immersed tube channel crossing method.

The impact of increased levels of suspended solids on water quality during dredging is the most significant potential impact of the preferred channel crossing method. However, these impacts can be successfully mitigated through the use of silt curtains, modified dredging techniques, and continual water quality monitoring. The MCZM consistency review and the USACOE permit applications referenced above detail mitigation measures that include:

- Use of a semi-confined dredging technique to limit the amount of sediments
  to be dredged and disposed of. Steel sheeting will extend approximately six
  inches above the channel bottom, preventing slumping of adjacent sediments into
  the dredged area. This will shorten the dredging period, and will limit the dredge
  volume to approximately that which would have been generated in the cofferdam
  alternative.
- Use of a closing clamshell bucket on the dredge. A closing clamshell bucket similar to that used for the dredging of the Third Harbor Tunnel across the Boston Inner Harbor will help avoid sediment spillage over the top of the bucket and lead to a considerable reduction in the level of suspended solids during dredging operations. Water quality impacts can be further reduced by using care with the rate of bucket lifting.
- Use of silt curtains around the dredge site that extend to the channel bottom during all phases of the tidal cycle. Full depth vented silt curtains extending to the channel bottom will be installed around the dredging operation. Opening and moving of the curtains will be facilitated by raising the curtain bottom with ropes preattached to the ballast chain. Excessive ballooning of the curtains will be controlled by the use of curtain windows of sufficient area to allow passage of water through the curtains during tidal changes. These windows will be located as close to the flotation as possible to prevent the passage of the more turbid lower waters.



- Close and frequent monitoring of water quality at key receptor points. Monitoring of the water quality in the Fort Point Channel will be conducted during the dredging, screeding, and backfilling of the channel crossing project. Turbidity will be continually monitored in the tanks of Neptune Lobster Company and James Hook & Company in the channel mouth area between Fan Pier and the New England Aquarium, and at the Congress Street Bridge; water quality in the Fort Point Channel will be monitored on a weekly basis. Monitoring will be conducted for turbidity, suspended solids, heavy metals, and polynuclear aromatic hydrocarbon (PAH) compounds at discrete intervals of the water column, including the bottom.
- Development of contingency plans for sea water service for nearby consumers. Should the amount of suspended solids in the tanks of the two lobster companies be found to exceed a background of 50 milligrams per liter despite the mitigation efforts, temporary intakes will be extended to points beyond the mouth of the Fort Point Channel.

#### Comment 67:

Finally, CLF requests as a permit condition that all water removed from the channel or from sediments during the dewatering process be treated to an appropriate specification before it is returned to the channel.

#### Response:

Dredged sediments will likely be placed on adjacent lands or deck barges for dewatering prior to disposal at an approved disposal site. In either case, waters will be filtered prior to discharge back to the harbor.

Should landside dewatering be utilized, waters will be diverted to detention basins for settling, and will be passed through filter fabric prior to discharge in the channel. Additionally, in-water silt curtains will be established in the channel at the point of discharge to prevent bottom disturbance and as further limitation to the spread of turbid waters.

Should deck barges be utilized, they will be outfitted with perforated peripheral drains that have been wrapped with filter fabric to facilitate dewatering and filtration prior to loading onto trucks for transport to the disposal site. In addition, the barges containing sediment being dewatered will be surrounded with silt curtains to limit the spread of turbid water. During dredging, the organic, near-surface sediments will be removed first to prevent mixing with the cleaner, underlying materials.

Review of these and potentially other water treatment methods will occur with the permitting of the dredging operations. These include, but are not limited to, review under the 401 Water Quality Certification and National Pollution Discharge Elimination System permitting processes under the federal Clean Water Act and the Notice of Intent review process under the Massachusetts Wetlands Protection Act.





Commonwealth of Massachusetts Executive Office of Environmental Affairs

# Department of Environmental Protection

William F. Weld Governor Daniel S. Greenbaum RECEIVED

TO:

Jan Reitsma, Director, MEPA Unit

FROM:

Carl F. Dierker, Acting Director

Division of Wetlands and Waterways

DATE:

February 11, 1994

RE:

South Boston Fiers/Fort Point Channel Transit

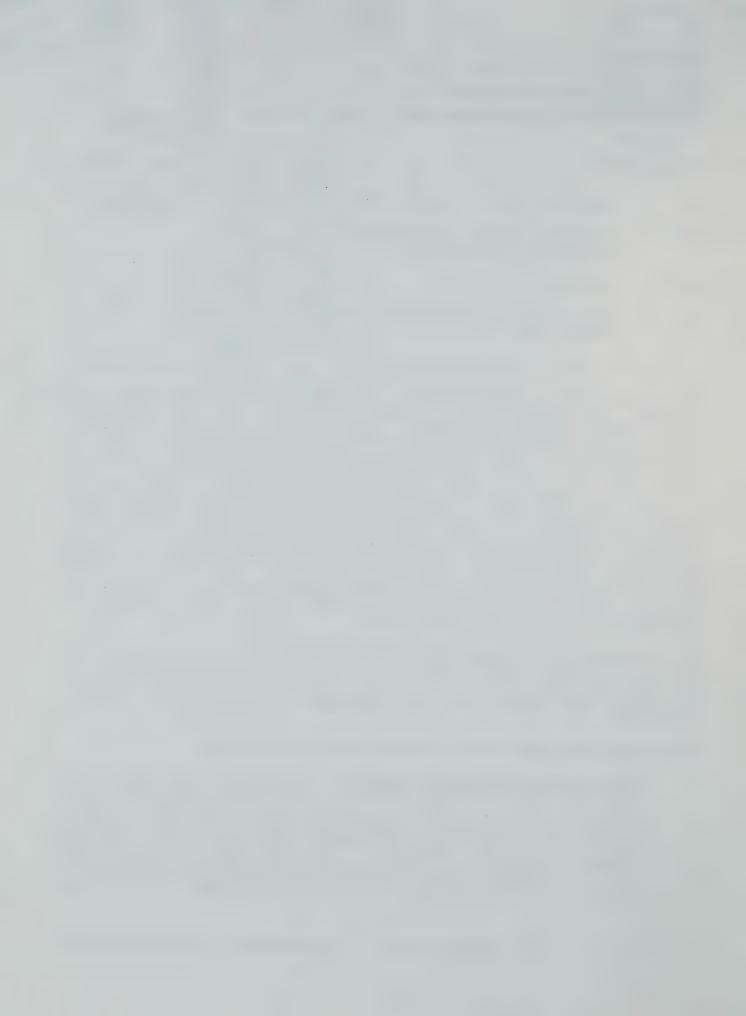
EOEA #6826

The Department of Environmental Protection, Waterways Regulation Program, has reviewed the above referenced Final Environmental Impact Report/Statement (EIR/S). Based on comments received on the Draft EIR and Supplemental Draft EIR/S, a locally preferred transit alternative was chosen by the Massachusetts Bay Transit Authority (MBTA) for the Fort Point Channel/South Boston Piers area. This alternative, the Full Build Underground Transitway, would provide transit service to World Trade Center from Boylston Street using either trackless trolleys or dual mode buses. The Final EIR/S described a major change in the transitway alignment which is now proposed to be located under the historic Russia Wharf buildings and totally embedded in the soils below Fort Point Channel. The Department supports this realignment because the historic buildings can be safely underpinned and there will be no permanent navigational impacts in the Channel.

The proponent has adequately addressed the Department's comments on the Supplemental Draft EIR/S which, along with the information to be provided in the ch. 91 license application review process, should be sufficient for the Department to make its licensing decision.

The Department has the following specific comments:

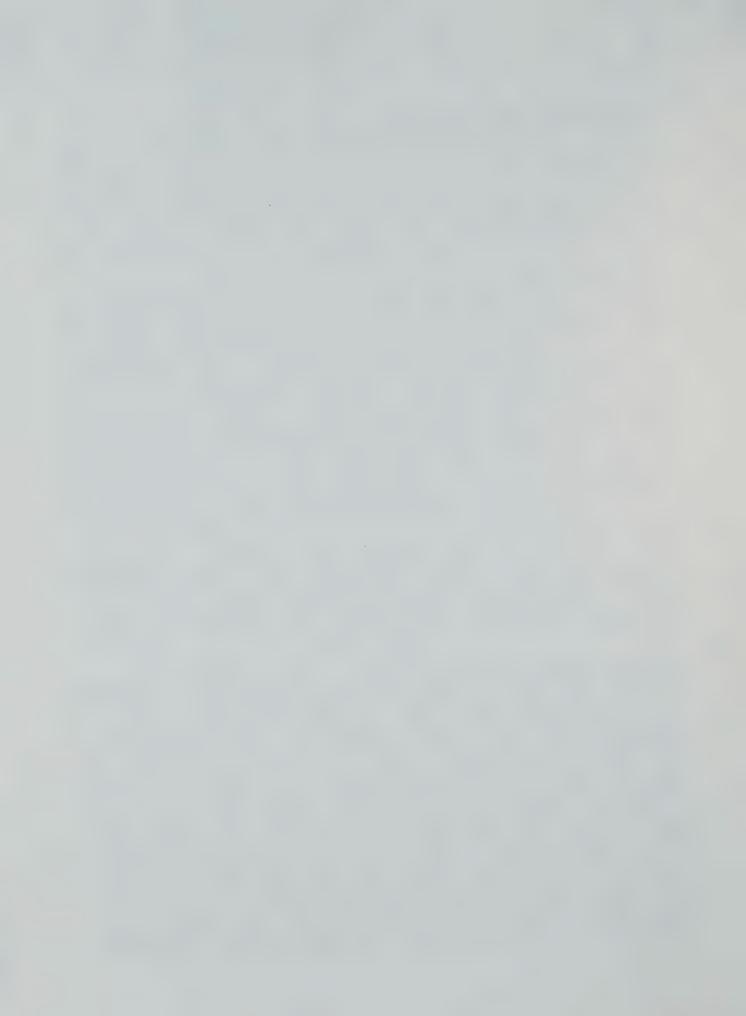
Determination of Water-Dependency: The Department agrees with the assertion that this project consists of an infrastructure crossing facility (under Fort Point Channel) that is water-dependent and an infrastructure facility (transitway) with an accessory use (storage and maintenance facility) that are nonwater-dependent. Therefore, the Department has determined that the project constitutes a nonwater-dependent use project subject to the regulatory standards of 310 CMR 9.01 - 9.40 and 9.55.



68 Construction Impacts to Water-Dependent Uses: The traffic maintenance plans to be prepared by the proponent during the license application process should carefully address, and mitigate as may be necessary, the truck traffic patterns associated with the South Boston Designated Port Area to ensure there is no significant disruption (310 CMR 9.36(3)). The proponent should review the Central Artery Project's South Boston Traffic Study and associated public comments and incorporate all relevant information and mitigation.

Potential water quality impacts must be minimized to the greatest extent possible while constructing the transitway under Fort Point Channel to ensure that the nearby industrial and commercial users of the channel water are not disrupted (James Hook and Company, Neptune Seafood, Gillette Company, 69 and the New England Aquarium). As stated in the Department's previous comments, and echoed by the comments of the National Marine Fisheries Service, cofferdam construction is the preferred methodology because of the reduced potential for suspended solids. During license application review, a water quality management plan should be prepared to ensure proper for these companies is provided regarding mitigation construction impacts, stormwater runoff and groundwater discharge. Again, the proponent should review plans prepared by the Central Artery project to address this same concern. 

- 70 There is the potential that two water-dependent industrial uses may need to be relocated (the New England Seafood Cooperative and Subaru vehicular storage). Further information should be provided during license application review to ensure there is no involuntary displacement of these industries and that the project can provide comparable facilities if needed (310 CMR 9.36(5)).
- Greater detail is needed in the licensing Public Access: process to determine how the project will provide public access along the waterfront and open space for active or passive recreation at or near the water's edge in accordance with 310 CMR 9.55. Such walkways and parkland could be provided along Fort Point Channel in front of the existing MBTA maintenance yard, on the Victoria Station restaurant property (since the project plans to take this property), and/or along Pappas Way on Reserve Channel. The two former locations would complement well with the Harborwalk improvements to be provided by the Central Artery project as well as expand upon the open plaza in front of the Children's Museum adjacent to Victoria Station. The Central Artery project has committed to providing landscaped walkways with observation nodes along the majority of Fort Point Channel as well as an expanded plaza at the proposed Vent Buildings #1 and #3 which was unfortunately omitted from the Harborwalk description in the Final EIR/S. (The Central Artery project is



constructing walkways along the western shore of the Channel from New Northern Avenue Bridge to Summer Street and from Dorchester Avenue to West Forth Street and along the eastern shore from Dorchester Avenue through the Gillette property.)

- shore from Dorchester Avenue through the Gillette property.)

  72 The Final EIR/S recognizes that the visual impact of the maintenance facility must be minimized from the perspective of the passing pedestrian along, or boater within, the Reserved Channel (310 CMR 9.55(1)). The proponent should describle how this will be accomplished within the license application using supporting graphics as necessary.
- Water Transportation: The Final EIR/S recognized that water transportation could play a supplemental role in providing public transportation to the Fort Point Channel/South Boston Piers area. While the Department would not consider moving the underground transit stations, the proponent should explore all feasible options to integrate the Transitway with proposed water transportation terminals along Fort Point Channel and at World Trade Center. This is especially important considering the critical advantage a water shuttle would have over a land based shuttle during the construction period for this and other large scale public projects.

Waterways Application Status: The Department awaits the filing of a Waterways Application which meets the minimum standards required to assign a file number pursuant 310 CMR 9.11(2)(b).

The MBTA has actively solicited the Department's input in the development of the proposed project and I am encouraged by the results of this open communication. I look forward to continuing this cooperative working relationship which will ensure the project is efficiently reviewed in a manner that allows this vital public transportation link to be established. Any questions regarding the above should be directed to Andrea Langhauser, Regional Planner, at (617) 292-5935.

## CFD/ADL/al

cc: P. Brady, CZM

J. Mead, CZM

N. Polcari, MBTA M.B. Mello, FTA

A. Magee, Rizzo Associates

S. Danzell, Cortell and Associates

File



# **Department of Environmental Protection**

#### Comment 68:

The traffic maintenance plans to be prepared by the proponent during the license application process should carefully address, and mitigate as may be necessary, the truck traffic patterns associated with the South Boston Designated Port Area to ensure there is no significant disruption (310 CMR 9.36(3)). The proponent should review the Central Artery Project's South Boston Traffic Study and associated public comments and incorporate all relevant information and mitigation.

#### Response:

The MBTA has coordinated closely with the CA/T Project, Massachusetts Port Authority (Massport), Boston Transportation Department (BTD), and others throughout preparation of the *South Boston Truck Access and Circulation Study*. This study has examined the impact of the Transitway and CA/T Projects on traffic in the South Boston Designated Port Area (DPA), and recommended mitigation to minimize adverse impacts. The MBTA will continue to coordinate with the CA/T Project in the next phase of this study. Traffic maintenance plans for construction of the Transitway will reflect all relevant results, mitigation, and comments of the CA/T Project's study. Consistent with 310 CMR 9.36(3), traffic maintenance plans for the Transitway will avoid, minimize, or mitigate adverse impacts to truck traffic patterns associated with the South Boston DPA.

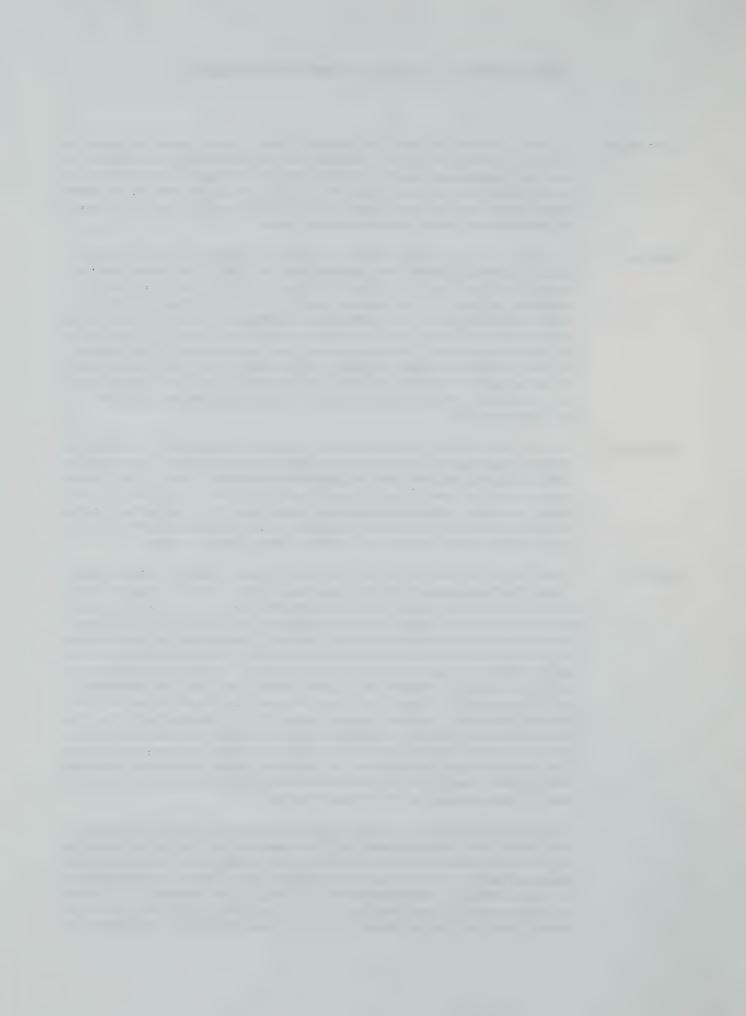
#### Comment 69:

As stated in the Department's previous comments, and echoed by the comments of the National Marine Fisheries Service, cofferdam construction is the preferred methodology because of the reduced potential for suspended solids. During license application review, a water quality management plan should be prepared to ensure proper mitigation for these companies is provided regarding construction impacts, storm water runoff and groundwater discharge. Again, the proponent should review plans prepared by the Central Artery project to address this same concern.

#### Response:

The MBTA has met with the U.S. Army Corps of Engineers (USACOE), Massachusetts Coastal Zone Management (MCZM), Department of Environmental Protection (DEP), and the Conservation Law Foundation to discuss the Fort Point Channel crossing construction methods. Based on these meetings and analysis of both the immersed tube and cofferdam construction methods, the MBTA has selected the semi-confined concrete immersed tube construction method over the cofferdam as the preferred alternative for the crossing of the Fort Point Channel. This method minimizes total construction duration, in-water construction duration, and costs, and enhances the ability to successfully mitigate environmental impacts. Specifically, the semi-confined concrete immersed tube can be constructed 11 to 13 months faster than the cofferdam; has a 30-week, versus a 68-week, in-water construction period; is estimated to cost \$3.5 million less than the cofferdam method; and can be constructed in an environmentally sound manner, as discussed below. In addition, the use of semi-confined dredging techniques will limit dredged material volumes to amounts similar to those resulting from the cofferdam method.

Immersed tube construction involves channel dredging within a semi-confined area. Two parallel rows of steel sheeting will be driven into the channel bed along the alignment to preclude the necessity of side-sloping excavation. This sheeting will extend approximately six inches above the channel bottom. The channel bed between the rows of sheeting will then be excavated, or dredged, to the necessary depth. Upon proper preparation of the channel bed, a single tube section, constructed off-site and sealed at each end, will be floated into position over the dredged alignment and



lowered (or "sunk") into place. Crossing of the channel will require three such sections and will result in a navigational constraint of approximately one-half the width of the channel at any given time. Upon completion of construction, the tunnel will be covered with clean, compatible materials.

The cofferdam construction method differs from the immersed tube method in that all construction would occur in place. This method would have entailed installation of a sheet pile cofferdam across one-half of the Fort Point Channel, while leaving the remaining half of the channel open for tidal flushing and navigation. Once the cofferdam was installed, the confines of the cofferdam would be cross-braced, dewatered, and excavated to the tunnel design depth; the Transitway tube would then be cast in place. Upon completion of the first half of the channel tunnel, the cofferdam would be removed and construction of the second half of the tunnel initiated. During this process, a portion of the first cofferdam would need to remain in place to maintain continuity between the two halves of the cofferdam crossing. Upon completion of the channel crossing, sheet piles used for the cofferdam would be cut at the mud line and left in place to ensure soil stability in the immediate vicinity of the tunnel.

In accordance with USACOE requirements, Tier I (data review) and Tier II (chemical evaluation) reports have been prepared that include descriptions of the Fort Point Channel crossing construction methodologies and sequencing, existing sediment conditions, and sediment dredging and disposal requirements and alternatives. A MCZM Federal Consistency Certification Statement, USACOE Section 404 Permit Application, and Section 401 Water Quality Certification have been filed which detail the construction methodology, sequencing, impacts, and mitigation measures for the preferred crossing method. A MCZM Federal Consistency Certification Statement, USACOE Section 404 Permit Application, and Section 401 Water Quality Certification have been filed which detail the construction methodology, sequencing, impacts, and mitigation measures for the preferred immersed tube channel crossing method.

The impact of increased levels of suspended solids on water quality during dredging is the most significant potential impact of the preferred channel crossing method. However, these impacts can be successfully mitigated through the use of silt curtains, modified dredging techniques, and continual water quality monitoring. The MCZM consistency review and the USACOE permit applications referenced above detail mitigation measures that include:

- Use of a semi-confined dredging technique to limit the amount of sediments
  to be dredged and disposed of. Steel sheeting will extend approximately six
  inches above the channel bottom, preventing slumping of adjacent sediments into
  the dredged area. This will shorten the dredging period, and will limit the dredge
  volume to approximately that which would have been generated in the cofferdam
  alternative.
- Use of a closing clamshell bucket on the dredge. A closing clamshell bucket similar to that used for the dredging of the Third Harbor Tunnel across the Boston Inner Harbor will help avoid sediment spillage over the top of the bucket and lead to a considerable reduction in the level of suspended solids during dredging operations. Water quality impacts can be further reduced by using care with the rate of bucket lifting.
- Use of silt curtains around the dredge site that extend to the channel bottom during all phases of the tidal cycle. Full depth vented silt curtains extending to the channel bottom will be installed around the dredging operation. Opening and



moving of the curtains will be facilitated by raising the curtain bottom with ropes preattached to the ballast chain. Excessive ballooning of the curtains will be controlled by the use of curtain windows of sufficient area to allow passage of water through the curtains during tidal changes. These windows will be located as close to the flotation as possible to prevent the passage of the more turbid lower waters.

- Close and frequent monitoring of water quality at key receptor points.
   Monitoring of the water quality in the Fort Point Channel will be conducted during
   the dredging, screeding, and backfilling of the channel crossing project. Turbidity
   will be continually monitored in the tanks of Neptune Lobster Company and James
   Hook & Company in the channel mouth area between Fan Pier and the New
   England Aquarium, and at the Congress Street Bridge; water quality in the Fort
   Point Channel will be monitored on a weekly basis. Monitoring will be conducted
   for turbidity, suspended solids, heavy metals, and polynuclear aromatic
   hydrocarbon (PAH) compounds at discrete intervals of the water column, including
   the bottom.
- Development of contingency plans for sea water service for nearby consumers. Should the amount of suspended solids in the tanks of the two lobster companies be found to exceed a background of 50 milligrams per liter despite the mitigation efforts, temporary intakes will be extended to points beyond the mouth of the Fort Point Channel.

#### Comment 70:

There is the potential that two water-dependent industrial uses may need to be relocated (the New England Seafood Cooperative and Subaru vehicular storage). Further information should be provided during license application review to ensure there is no involuntary displacement of these industries and that the project can provide comparable facilities if needed (310 CMR 9.36(5)).

#### Response:

MBTA decisions regarding the New England Seafood Center and location of a maintenance facility will not result in the relocation of any existing water-dependent uses. These decisions are discussed in more detail below.

#### The New England Seafood Center

The New England Seafood Center is located on a 4.4-acre parcel at 145 Northern Avenue and is bordered by the East Service Road on the west, B Street on the east, and Congress Street (and the proposed New Congress Street) on the south. The land and building are owned by eight partners of the Massachusetts partnership known as the New England Seafood Center Associates.

The Center consists of a brick and concrete structure containing fish processing and wholesale distribution companies, as well as a nightclub in the northernmost portion of the building. The building contains approximately 85,600 square feet and was built in two sections. The section that fronts on Northern Avenue was constructed in 1954, and the rear portion was constructed in 1970.

The building has loading docks on the east, west, and south sides. Truck access is maintained around the entire building. The non-fish tenant, the nightclub known as "Polly-Estas," also has a loading dock where beverages are handled. All loading docks required for fish processing require refrigeration. The portion of the lot that is not utilized by either the building, access ways, or loading docks is occupied by



parking spaces used by employees and occasional visitors. In the evening, the lot is also used by patrons of the nightclub.

Two options have been considered relative to the construction of the Transitway Project through the New England Seafood Center property. These include acquiring the Seafood Center and subsequently demolishing it during construction, or structurally underpinning the building and constructing the Transitway tunnel beneath it. Although the building does not lie within the South Boston DPA, it does lie within Chapter 91 jurisdictional boundaries, and acquisition would thus raise the issue of involuntary displacement of water-dependent uses pursuant to 310 CMR 9.36. Acquisition and demolition of the building would require the relocation of all tenants. Additionally, building demolition would result in an expansion of the anticipated area of construction-related disruption and an increase in the project-related volume of demolition wastes. Underpinning would not require the relocation of tenants and would avoid the associated impacts of building demolition.

Upon completion of the project's FEIS/FEIR, the MBTA further investigated the two options for the New England Seafood Center, working closely with agencies such as Massport, Massachusetts Highway Department (MHD) and the CA/T Project, BTD, Boston Redevelopment Authority (BRA), and Economic Development and Industrial Corporation (EDIC), as well as with the Seafood Center owners and occupants. Issues regarding future land uses, roadway improvements, construction schedules, and costs were discussed and evaluated. Since this coordination effort did not result in an acquisition plan that was acceptable to all parties, the MBTA proposes to underpin, rather than acquire, the New England Seafood Center. Underpinning, which will not require the relocation of Seafood Center tenants is technically feasible and is less expensive than an acquisition.

The MBTA recognizes that construction of the Transitway tunnel will require coordination with a number of parties, including area property owners, adjacent businesses, and nearby construction projects. A conceptual design for the proposed underpinning of the Seafood Center consists of jacking pipepiles under the existing foundation and constructing steel framing for support of the building. This method requires jacking and receiving pits on the east and west sides of the building, which must be accessible to the surface. All other work will occur underground and will have little or no effect on the structure during and upon completion of construction. During construction, access to the jacking and receiving pits will require close coordination with the Seafood Center tenants to ensure adequate loading dock space, access around the site, maintenance of power for refrigeration, and parking. Any potential disruption of operations during MBTA construction will require mitigation by the MBTA. The MBTA will work with tenants of the Seafood Center, the CA/T Project, and other adjacent projects as the underpinning scheme is designed to further identify impacts and mitigation. Maintenance of traffic plans during underpinning of the Seafood Center by the MBTA will consider such mitigation measures as accommodation of Center truck traffic in adjacent streets, construction during nighttime hours, off-site parking, and loading area reconfiguration. These maintenance of traffic plans will be coordinated with any plans approved for the CA/T Project.

#### **Maintenance Facility**

In the FEIS/FEIR, the MBTA analyzed two potential sites for the Transitway Project's maintenance and storage facility. Site A is located at the corner of Summer Street and Pappas Way, while Site B is located on West First Street between E Street and Pappas Way; both sites are located within Chapter 91 jurisdiction. These two sites



were screened from a larger number of potential sites, and both were deemed appropriate for location of a maintenance and storage facility to support the Transitway Project.

After several meetings with Massport and Pappas Management Corporation, the owners or representatives of the owners of the two sites under consideration, the MBTA has selected Site B on West First Street for location of the Transitway Project's maintenance and storage facility. The site is preferable over Site A given that no impact to existing water-dependent uses would result. Site B also meets several other important design criteria:

- Selection of this site will not displace any existing water-dependent use. This criterion is particularly important, since the economic vitality of South Boston depends in large part on the area's water-dependent businesses and industries. A portion of Site A located at the corner of Summer Street and Pappas Way is currently used for Subaru overflow vehicle parking; since these vehicles are transported by water, this overflow parking lot is determined to be a water-dependent use. Although Site B is also within Chapter 91 jurisdiction, it does not contain any existing water-dependent uses. It is, therefore, a more desirable location for the Transitway's maintenance facility. Tenants of the site, which is predominantly owned by Massport and partially owned by Atlantic, Inc., include Fortress Records, Corporate Printing Company, Shaughnessy Warehouse, Roadway Trucking, PPG Industries, Yankee Bus, Emerson College, NYNEX, U.S. Postal Service parking, Boston Harbor Industrial Development Corporation, and E Street Associates.
- The site is roughly one-half mile from the Transitway portal, and is located along a future Transitway route to residential South Boston as part of the full build configuration. This location thus minimizes non-revenue producing trips (i.e., "deadheading") for transit vehicles beginning or ending their service routes. It also reduces the need to install additional catenary (overhead wires that provide electrical power to the trackless trolley vehicles) as part of the full build Transitway to extend surface service into residential South Boston; catenary will simply be extended from the West First Street facility. The ability to utilize the same catenary for non-revenue trips to the maintenance facility and revenue trips into residential South Boston as part of the full build Transitway will reduce both one-time construction and ongoing operating and maintenance costs. In addition, combined use of the catenary will limit potential adverse environmental impacts, including visual and aesthetic impacts of the overhead catenary and support structures. This is an important issue as the Piers area streetscape evolves.
- The surrounding area is compatible with activities associated with the Transitway's
  maintenance and storage facility. The site is adjacent to other light industrial
  development, and the area in which it is located is expected to remain in such use
  for the long term. No residential or commercial areas will be affected.
- The site is physically suited to development as a maintenance and storage facility.
  There are a few structures on the site that would need to be removed. Utility service is adequate, eliminating the need for costly infrastructure work. The parcel is regularly shaped, enabling efficient use of the parcel for construction and operation of the facility.



 No hazardous waste spills or releases were identified at this site, based upon review of files of the U.S. Environmental Protection Agency and the Massachusetts Department of Environmental Protection.

#### Comment 71:

Greater detail is needed in the licensing process to determine how the project will provide public access along the waterfront and open space for active or passive recreation at or near the water's edge in accordance with 310 CMR 9.55. Such walkways and parkland could be provided along Fort Point Channel in front of the existing MBTA maintenance yard, on the Victoria Station restaurant property (since the project plans to take this property), and/or along Pappas Way on Reserve Channel. The two former locations would complement well with the Harborwalk improvements to be provided by the Central Artery project, as well as expand upon the open plaza in front of the Children's Museum adjacent to Victoria Station.

#### Response:

The Chapter 91 Waterways License regulations "Standards for Non-water Dependent Infrastructure Facilities" (310 CMR 9.55) establish guidelines for ensuring project avoidance or impact mitigation relative to the water-related interests of the public. These interests include the protection of maritime commerce, industry, recreation and associated public access; the protection, restoration, and enhancement of living marine resources; the attainment of water quality goals; the reduction of flood and erosion-relate hazards; the protection and enhancement of public views and visual quality in the natural and built environment; and the preservation of historic sites and districts, archaeological sites, and other significant cultural resources near waterways. In addition to the above standards, infrastructure projects must "take reasonable measures to provide open spaces for active or passive recreation at or near the water's edge."

The degree to which each of these standards is appropriate to the project alternatives was reviewed in the FEIS/FEIR. Impacts and mitigation measures common to all alternatives were also identified and reviewed. Specific mitigation measures and associated implementation plans for the preferred alternative which meet the above standards will be developed in coordination with the DEP Division of Wetlands and Waterways during the Chapter 91 licensing process. These plans will address both permanent measures, such as the reestablishment/construction of public walkways on either side of the Fort Point Channel at the point of crossing, and short-term or construction mitigation measures, such as dredging techniques to minimize water quality impacts in the Fort Point Channel.

Particular attention during project licensing will focus upon the provisions for public access along the waterfront and open space for active and passive recreation at or near the water's edge. As noted in the FEIS/FEIR, the proposed Transitway Project establishes an important public transportation link between downtown Boston and the Piers area. As such, the project creates a broader accessway to the Boston Harbor waterfront while supporting the continued maritime use of the area. Other mitigation measures relating to public access and use of the waterfront which will be considered during the licensing process will include the reestablishment/construction of public walkways along the Fort Point Channel, the exploration of similar opportunities along the Reserved Channel at Pappas Way near the proposed maintenance facility, and station design components to emphasize waterfront themes and facilitate pedestrian waterfront access.

#### Comment 72:

The final EIR/S recognizes that the visual impact of the maintenance facility must be minimized from the prospective of the passing pedestrian along, or boater within, the Reserved Channel (310 CMR 9.55(1)). The proponent should describe how this



will be accomplished within the license application using supporting graphics as necessary.

#### Response:

The MBTA has selected Site B on West First Street for location of the Transitway Project's maintenance and storage facility. The site is preferable over Site A given that no impact to existing water-dependent uses would result. Site B is also further from the Reserved Channel; it is some 300 feet away as compared to only 100 feet away for Site A. Given that the facility's building height will be approximately 30 feet, minimal visual impact is anticipated. However, the facility will be designed to blend with any new buildings being proposed for the district. Its roofscape will also be designed to be compatible with the general landscape as seen from the surrounding higher buildings. These design criteria and supporting graphics will be incorporated into the project's Chapter 91 license application.

#### Comment 73:

While the Department would not consider moving the underground transit stations, the proponent should explore all feasible options to integrate the Transitway with proposed water transportation terminals along Fort Point Channel and at World Trade Center. This is especially important considering the critical advantage a water shuttle would have over a land based shuttle during the construction period for this and other large scale public projects.

#### Response:

As DEP has suggested, the MBTA will attempt to integrate the Transitway with any future water transportation terminals along the Fort Point Channel and World Trade Center while maintaining the station locations proposed in the FEIS/FEIR; these station locations have been based on overall optimal walk access throughout the Piers area. Although the sites of future docks are not finalized, as noted in the FEIS/FEIR, the Transitway stations are located within a reasonable walking distance of likely dock sites at Fan Pier and World Trade Center. However, there may be limited potential for transfers from the Transitway to water transportation services since, based on findings of previous studies, water transportation services to the Piers area will most likely serve inner harbor dock locations. Since the Transitway is intended to provide service to the Piers area from a variety of downtown Boston locations and rapid transit transfer stations, the advantages of transferring to water transportation services to reach similar destinations may be limited. The greatest advantage of integrating of the Transitway with water transportation is to enhance the accessibility of inner harbor ferry services to passengers traveling to or from areas of the South Boston Piers that are beyond walking distance of the dock sites. To this end, the MBTA will cooperate with the future findings of MHD's Inner Harbor Study in subsequent stages of project implementation. At a minimum, cooperative activities will include signage in Transitway stations. The MBTA will consider other activities that facilitate connections between the two transit services.



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January 12, 1994

#### BY HAND

Ms. Mary Beth Mello, Chief of Program Development Department of Transportation Federal Transit Administration - Region I 55 Broadway Cambridge, MA 02142

Secretary, Executive Office of Environmental Affairs 100 Cambridge Street - Room 2000 Boston, MA 02201 Attention: MEPA Unit: EOEA No. 6826

RE: South Boston Piers/Fort Point Channel Transit Project FEIS/FEIR

Ladies and Gentlemen:

These comments on the above FEIS/FEIR are submitted on behalf of Fan Pier Land Company and HBC Associates, as owner and ground lessee of the property located at 28-70 Northern Avenue in South Boston and known as the Fan Pier.

### Anticipated Economic Development in the South Boston Piers Area

Fan Pier Land Company and HBC Associates strongly support the Underground Transitway Full Build Alternative for all of the reasons set forth in the FEIS/FEIR, but particularly because (as noted in the FEIS/FEIR) "the Full Build Alternative is the only alternative that can fully support the 2010 development goals of the South Boston Piers area." There is a consensus among all concerned parties (public and private) that the South Boston Piers area can, should and will be the location of the next wave of economic growth in the City of Boston. The pending



HILL & BARLOW

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January 12, 1994 Page 2

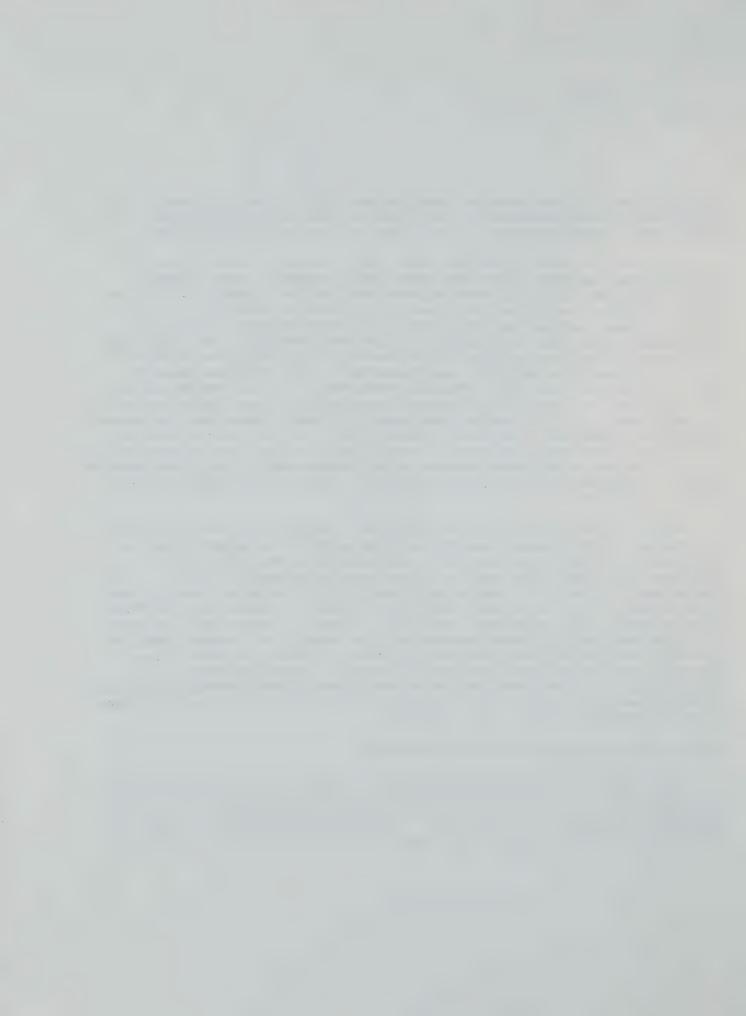
construction of the Federal Courthouse and the pending expansion of the World Trade Center, for example, are two of the most significant developments in the City of Boston at this time.

In order to underline the need for the Full Build Alternative, we note that both the "high growth" and "lower growth" projections for development on the Fan Pier by 2010 (set forth in Table 3-4) are cautious, and perhaps overly conservative, estimates of potential future use at this site. The master plan for the Fan Pier site set forth in the Final EIR submitted by HBC Associates in November 1986 described a mixed use development containing approximately 2.97 million square feet. At that time this density received City of Boston zoning approval in the form of a Planned Development Area designation and approval. For planning purposes, it must therefore be deemed reasonably possible (if not likely) that the full build-out of this site over the next twenty years in a "high growth" scenario would involve total development of approximately 3 million square feet (as opposed to the approximately 2.25 million square feet shown on Table 3-4).

With respect to the "lower growth" projection, we note that the Federal Government has in fact acquired the parcel for the new Federal Courthouse and that all significant permits and licenses for the construction have been obtained. It is therefore a practical certainty that 760,000 square feet of new development will have been constructed and occupied on the Fan Pier site by 2010 (indeed, by 2000). Even if one uses the same 25% discounting for development of the remaining vacant land as was applied to the neighboring McCourt property in the "lower growth" scenario, then the more accurate "lower growth" projection for the Fan Pier site would be approximately 1,200,000 square feet (as opposed to the approximately 600,000 square feet shown on Table 3-4).

# Vital Role of Improved Public Transit

The Full Build Alternative plays a vital role in preventing unnecessary conflict between the coming economic development in the South Boston Piers area and the existing neighborhoods and economic activity in this area. The current effort to regulate the supply of parking in the South Boston Piers area can not by



HILL & BARLOW

> January 12, 1994 Page 3

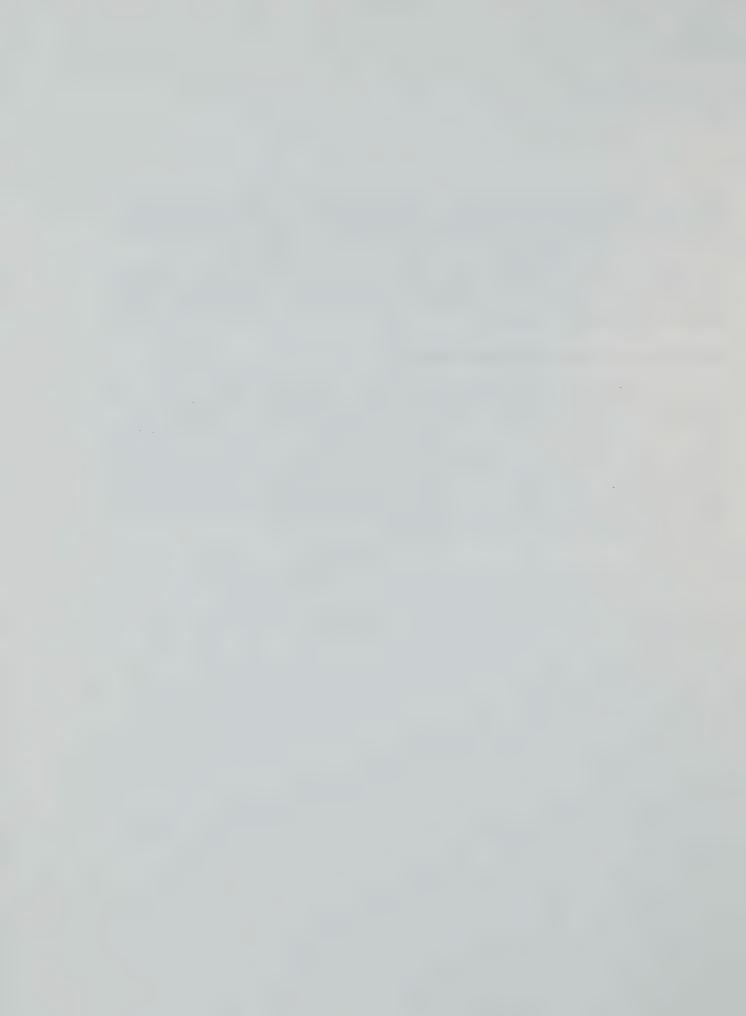
itself adequately balance the interests of economic development and land use control. Indeed, the working assumption of the South Boston parking freeze is that parking supply limitations will not hinder anticipated economic development precisely because of the availability of alternative modes of transportation (in particular, public transportation). Because the South Boston parking freeze will begin to take effect in 1994, it is urgent that improved public transit services follow immediately on its heels.

## Need for Construction Coordination

We also note that the coordination of construction with the Central Artery/Third Harbor Tunnel will not only generate substantial cost savings, but it will also help to reduce the very significant uncertainty and disruption generated by the presence of these two pending public projects in the South Boston Piers area. As prior comments by many parties in this process have already revealed, the sooner the Full Build Alternative is designed and implemented, the sooner the residents, landowners and businesses of this area can resume their own important plans for future growth and improvements.

Sincerely,

Gregory P. Bialecki



# Fan Pier Land Company and HBC Associates Hill & Barlow

#### Comment 74:

The master plan for the Fan Pier site set forth in the Final EIR submitted by HBC Associates in November 1986 described a mixed use development containing approximately 2.97 million square feet. At that time this density received City of Boston zoning approval in the form of a Planned Development Area designation and approval. For planning purposes, it must, therefore, be deemed reasonably possible (if not likely) that the full build-out of this site over the next 20 years in a "high growth" scenario would involve total development of approximately three million square feet (as opposed to the approximately 2.25 million square feet shown on Table 3-4).

#### Response:

The MBTA recognizes that on a parcel-by-parcel basis, development estimates presented in the FEIS/FEIR and used for area-wide planning purposes may not always accurately reflect build-out levels approved for individual parcels. However, consistent with the ridership demand forecasting methodology approved by the Federal Transit Administration (FTA) for the South Boston Piers Transit Project, development projections prepared for the area by the CA/T Project have been utilized. These projections are believed to provide a reasonable basis for forecasting trip demand in the South Boston Piers area on an aggregate basis.

#### Comment 75:

With respect to the "lower growth" projection, we note that the Federal Government has in fact acquired the parcel for the new Federal Courthouse and that all significant permits and licenses for the construction have been obtained. It is, therefore, a practical certainty that 760,000 square feet of new development will have been constructed and occupied on the Fan Pier site by 2010 (indeed by 2000). Even if one uses the same 25 percent discounting for development of the remaining vacant land as was applied to the neighboring McCourt property in the "lower growth" scenario, then the more accurate "lower growth" projection for the Fan Pier site would be approximately 1,200,000 square feet (as opposed to approximately 600,000 square feet shown on Table 3-4).

#### Response:

A lower growth development scenario was analyzed in response to concerns expressed by the FTA regarding the impact of a downturn in the regional and national economies on projected build-out in the Piers area. The lower growth development scenario described in the FEIS/FEIR for the year 2010 reflects the CA/T Project's development projections for the year 2000. In other words, the lower growth scenario provides a basis for analyzing the need for and impacts of the transit project in an environment where development anticipated by 2000 does not occur until 2010. The CA/T Project's development projections for the year 2000 do not reflect a consistent "discounting" factor of 25 percent. The MBTA recognizes that the lower growth scenario understates approved development for the Fan Pier site, and as part of the FEIS/FEIR process has determined that the high growth scenario is a more accurate reflection of future development in the Piers area.





# General Services Administration New Boston Courthouse Project Office J.W. McCormack PO & Cthse. Rm. 1417 Boston, MA 02109



January 20, 1994

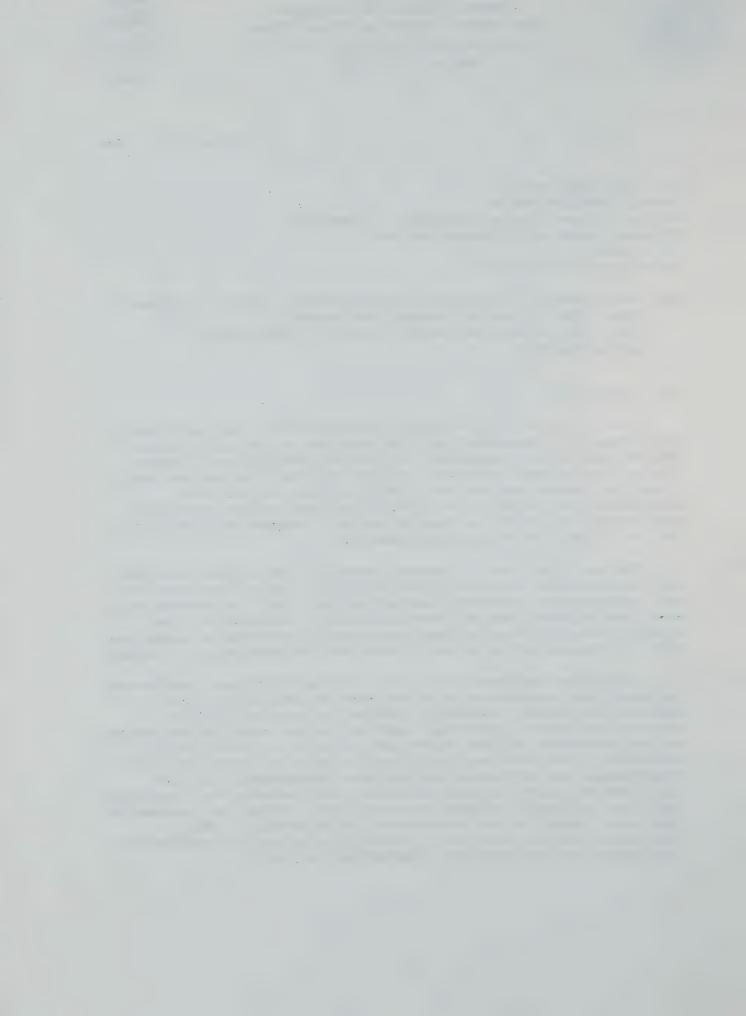
Ms. Mary Beth Mello
Deputy Administrator
Federal Transit Administration - Region I
US Department of Transportation
55 Broadway
Cambridge, MA 02142

Re: South Boston Piers/Fort Point Channel Transit Project Final Environmental Impact Statement/ Final Environmental Impact Report (FEIS/FEIR)/ EOEA No. 6826

#### Dear Ms Mello:

The US General Services Administration has continually monitored and commented on the Fort Point Transit Project and we are highly dependent on the successful and timely completion of this project to the full build alternative in order to insure convenient public access to our new courthouse building. As a result of our recent review of the Final FEIS/FEIR we remain in full support of the project and we offer the following comments.

- 1. The service level proposed based on peak hour ridership and mode share considering capacity of the articulated bus and the service interval should be verified for consistency with anticipated demand particularly in regards to the Monday morning commute when the normal courthouse commuters will be augmented by some of the 200-300 prospective jurors.
- 2. The street extension of New Farnsworth Street indicated between the courthouse station head house and the new courthouse is not presently planned by the city. At a minimum a direct pedestrian walkway along what is indicated as an extension of New Farnsworth Street is required to maximize the convenient utilization of the transitway for courthouse and adjacent harbor park commuters. If the adjacent property is not developed and remains as a parking lot then a direct walkway through the parking lot connecting the head house to the courthouse is necessary. The provision to provide such a connection should be addressed and incorporated into the transitway project.



If you have any questions regarding these comments please call me at (617) 223 8607.

Sincerely,

Frank Saviano

Project Architect



# General Services Administration New Boston Courthouse Project Office

#### Comment 76:

The service level proposed based on peak hour ridership and mode share considering capacity of the articulated bus and the service interval should be verified for consistency with anticipated demand particularly in regards to the Monday morning commute when the normal courthouse commuters will be augmented by some of the 200 to 300 prospective jurors.

#### Response:

The MBTA has designed the Transitway to meet the needs of a densely developed Piers area. The MBTA believes that the plans should easily meet the peak requirements of the Federal Courthouse against a background of moderate to high growth in the adjacent areas. Specifically, the capacity of Transitway trackless trolley services to the Piers area in the project's initial build configuration is 5,240, while the surface buses increase the capacity by over 5,700, providing a total capacity of almost 11,000. The impact of the 300 prospective jurors is less than three percent of this capacity, if all were to take transit.

More specifically, we can compare the Courthouse EIS demand with the projected demand to the Fan Pier area in the FEIS/FEIR to show that the Transitway has been designed to meet the anticipated need. The Courthouse EIS indicates that the A.M. peak hour will be the most intense time for arrivals at the Courthouse. In the Courthouse's opening year, 450 employees, 100 jurors, and 52 visitors (i.e., a total of over 600 people) are anticipated to arrive by transit. In the initial build Transitway, there are 1,164 projected A.M. peak hour transit trips in 2010 to the Fan Pier traffic zone, in which the Courthouse is located. (The Courthouse occupies nearly half of the Fan Pier area.) Thus, under this scenario, capacity is almost double the Courthouse demand. In the full build Transitway, the number of A.M. peak hour transit trips is 1,226. Thus, this scenario would accommodate more than twice the Courthouse opening year demand. It should also be noted that the transit mode share for employee work trips assumed in the Courthouse EIS is very high, at 81 percent. These can be compared to the projections of the transit project's FEIS/FEIR, which show a transit mode share to the Fan Pier traffic zone during peak hours of 66 percent in the initial build scenario and 70 percent in the full build scenario. If the FEIS/FEIR mode shares are assumed to be correct for the Courthouse, then the Courthouse transit demand would be somewhat lower. It is clear, however, that the Transitway service plan can accommodate the demands of the Courthouse.

Furthermore, the FEIS/FEIR describes interim service plans beginning in 1998 which have been designed to meet the Courthouse opening year demands for transit.

#### Comment 77:

The street extension of New Farnsworth Street indicated between the Courthouse Station headhouse and the new courthouse is not presently planned by the city. At a minimum a direct pedestrian walkway along what is indicated as an extension of New Farnsworth Street is required to maximize the convenient utilization of the transitway for courthouse and adjacent harbor park commuters. If the adjacent property is not developed and remains as a parking lot then a direct walkway through the parking lot connecting the headhouse to the courthouse is necessary. The provision to provide such a connection should be addressed and incorporated into the transitway project.



#### Response:

The MBTA is committed to providing safe and direct pathways between Courthouse Station in the vicinity of Farnsworth Street and the Federal Courthouse. While the MBTA agrees that, from the point of view of pedestrian movement and safety, provision of a pedestrian walkway along the former proposed extended Farnsworth Street from the Transitway station headhouses to the Federal Courthouse would be highly advantageous, no public right-of-way has been acquired for this walkway. Without such a right-of-way, Transitway passengers exiting at the Farnsworth Street headhouses will need to either walk west to Sleeper Street or east to Pittsburgh Ctreet to access the Courthouse. Signage will be provided both at the subsurface station level and at street level to assist passengers with directions to the Courthouse and other Piers area destinations. However, since this portion of the area is currently underdeveloped and may be for some years to come, the MBTA is hopeful that by working with the City of Boston, General Services Administration, and private property owners, a commitment to provide a pedestrian right-of-way along the Farnsworth Street extension can be obtained.



# THE JOHN DREW COMPANY

January 26, 1994

Ms. Mary Beth Mello
Deputy Regional Administrator
Federal Transit Administration - Region I
US Department of Transportation
55 Broadway
Cambridge, MA 02142

Dear Ms. Mello:

Re: South Boston Piers/Fort Point Channel Transit Project FEIS/FEIR EOEA No. 6826

The John Drew Company is pleased to have the opportunity to comment in response to the FEIS/FEIR for the South Boston Piers/Fort Point Channel Transit Project issued by the MBTA. The John Drew Company, on behalf of BOSCOM Partners and Fidelity Properties, Inc., is the developer for the proposed expansion project for the World Trade Center Boston.

You may recall that we have previously commented on the Draft EIR and Draft EIS/Supplemental Draft EIR for this project, as well as the Environmental Assessment/Notice of Project Change addressing the proposed construction of those Transitway elements which would be incorporated into the northbound Centeral Artery construction contract (C11A1). Copies of our correspondence are no doubt on file, and indeed the FEIS/FEIR includes responses to our comments on both the DEIR and the DEIS/SDEIR. However, we would like to take this opportunity to reiterate our previous expressions of support for the project.

The John Drew Company and World Trade Center Boston wholeheartedly support the Transit Project, and welcome the many benefits which it will realize. The Project will not only act as a stimulus for further economic development in the South Boston Piers/Fort Point Channel districts, but will enhance the substantial number of activities already present in the area, including the World Trade Center and its main tenant, Fidelity Investments. The substantial investment in other public infrastructure projects in the area will be optimized by the provision of much-needed transit service, and the resultant encouragement of transit rather than auto travel will bring significant environmental benefits to the local and wider area.



We also welcome the selection of the Full Build Alternative as the Locally Preferred Alternative, and are pleased to note some specific improvements in the FEIS/FEIR, in particular the adoption of the Option B alignment between Fan Pier and World Trade Center, and the incorporation of a design which can accommodate light rail in the future. We believe that it would be very important to take the New England Seafood Center rather than underpin the building to accommodate the Option B alignment. This would not only offer urban design advantages for the area, but would also optimize the development opportunities which could off-set the incremental cost associated with the taking.

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We are disappointed that the trackless trolley technology has been selected rather than dual-mode buses for which we previously expressed a preference. Although the FEIS/FEIR identifies some advantages of trackless trolley, it does miss the opportunity to extend continuous service from the Transitway through the Third Harbor Tunnel. We are very concerned about the impact of the necessary overhead catenary system for trackless trolley on local streets, and if the technology must be adopted it is essential that careful attention be paid to streetscape design. We urge that the trackless trolley selection be reconsidered.

We would again stress the urgency to move the Project forward expeditiously, in view of the somewhat delayed construction schedule compared to the DEIR submission. In addition, we offer the following comments with respect to issues which should be fully addressed as the Project is progressed.

The FEIS/FEIR analysis assumes that the existing shuttle bus services at World Trade Center will continue to be operated. While this is our intention, it is clear that additional public transit service would be of public benefit. The 1998 Interim Bus Service Plan described in the FEIS/FEIR does not provide specific service to World Trade Center, mainly because the World Trade Center Hotel, which will be completed in 1997, will not generate substantial numbers of transit trips. However, the schedule for our proposed office buildings is largely dependent on securing suitable tenants, which in turn depends upon attracting such tenants under a number of criteria including the provision of good transit service. Successful marketing of the office buildings could result in their construction as early as 1997/98. While the FEIS/FEIR recognizes that additional development could require additional service, we would suggest that the MBTA should commit to extending the Interim Year Service Plan to specifically serve our future developments as and when they are operational. Such a firm commitment would undoubtedly assist in efforts and negotiations to move our expansion forward, and thereby further stimulate development in the area.

It is clear that the Interim Year Service Plan is not yet final, and may be modified to recognize other factors such as the possible shuttle bus service between North and South Stations currently under consideration by the MBTA. Hence it should be possible to incorporate a contingency which would respond to potential future demand such as the proposed World Trade Center office buildings. Any such extension of service would of



course also strengthen transit service to the existing World Trade Center, the new World Trade Center Hotel, and other existing development in the area.

- World Trade Center clearly has a strong interest in the World Trade Center Station which will be the terminus point of the Transit Project. It is imperative that the design of this station be properly integrated with its surrounding uses, in particular the proposed Massport Garage and the expanded World Trade Center complex. Apart from design issues relating to the structural integration of the station and the transitway alignment with abutting structures, we are concerned that the Transit Project should not prejudice our final development parcel on the west side of Viaduct Street (south of New Congress Street), and are specifically interested in pedestrian connections to and from the station. We would request that World Trade Center be fully consulted throughout the further development of the station design to ensure proper coordination with our own expansion program.
- Full coordination is also essential during the construction of the Transit Project, and is particulary critical in light of the complex program of public infrastructure construction activities in the area. Issues of timing, traffic impact and local access must be fully addressed if the viability of the area is to be preserved during the construction period. The FEIS/FEIR references the MBTA's ongoing coordination in this respect with other public agencies, but we would again request that World Trade Center should be fully consulted in the development of construction staging and traffic maintenance plans.

Again, on behalf of the World Trade Center Boston and Fidelity Investments, the John Drew Company confirms its full support for the South Boston Piers/Fort Point Channel Transit Project, and commends the MBTA for its efforts in preparing a thorough FEIS/FEIR analysis. We trust that every effort will be made to move the Transit Project forward without delay, and we are ready and available to assist where possible in the process.

Thank you for the opportunity to comment on the proposed action.

Sincerely.

Brian F. Dacey

Executive Vice President

BFD:ka

cc Anne Meyers, Massport
John Drew, WTC
Susan Allen, John Drew Co.

David Black, TAMS



## The John Drew Company

#### Comment 78:

We believe that it would be very important to take the New England Seafood Center rather than underpin the building to accommodate the Option B alignment. This would not only offer urban design advantages for the area, but would also optimize the development opportunities which could off-set the incremental cost associated with the taking.

#### Response:

The New England Seafood Center is located on a 4.4-acre parcel at 145 Northern Avenue and is bordered by the East Service Road on the west, B Street on the east, and Congress Street (and the proposed New Congress Street) on the south. The land and building are owned by eight partners of the Massachusetts partnership known as the New England Seafood Center Associates.

The Center consists of a brick and concrete structure containing fish processing and wholesale distribution companies, as well as a nightclub in the northernmost portion of the building. The building contains approximately 85,600 square feet and was built in two sections. The section that fronts on Northern Avenue was constructed in 1954, and the rear portion was constructed in 1970.

The building has loading docks on the east, west, and south sides. Truck access is maintained around the entire building. The non-fish tenant, the nightclub known as "Polly-Estas," also has a loading dock where beverages are handled. All loading docks required for fish processing require refrigeration. The portion of the lot that is not utilized by either the building, access ways, or loading docks is occupied by parking spaces used by employees and occasional visitors. In the evening, the lot is also used by patrons of the nightclub.

Two options have been considered relative to the construction of the Transitway Project through the New England Seafood Center property. These include acquiring the Seafood Center and subsequently demolishing it during construction, or structurally underpinning the building and constructing the Transitway tunnel beneath it. Although the building does not lie within the South Boston Designated Port Area (DPA), it does lie within Chapter 91 jurisdictional boundaries. Acquisition and demolition of the building would therefore require the relocation of all tenants. Additionally, building demolition would result in an expansion of the anticipated area of construction-related disruption and an increase in the project-related volume of demolition wastes. Underpinning would not require the relocation of tenants and would avoid the associated impacts of building demolition.

Upon completion of the project's FEIS/FEIR, the MBTA further investigated the two options for the New England Seafood Center, working closely with agencies such as the Massachusetts Port Authority (Massport), Massachusetts Highway Department (MHD) and the CA/T Project, Boston Transportation Department (BTD), Boston Redevelopment Authority (BRA), and Economic Development and Industrial Corporation (EDIC), as well as with the Seafood Center owners and occupants. Issues regarding future land uses, roadway improvements, construction schedules, and costs were discussed and evaluated. Since this coordination effort did not result in an acquisition plan that was acceptable to all parties, the MBTA proposes to underpin, rather than acquire, the New England Seafood Center. Underpinning, which will not require the relocation of Seafood Center tenants is technically feasible and is less expensive than an acquisition.



The MBTA recognizes that construction of the Transitway tunnel through the New England Seafood Center property will require coordination with a number of parties, including area property owners, adjacent businesses, and nearby construction projects. A conceptual design for the proposed underpinning of the Seafood Center consists of jacking pipepiles under the existing foundation and constructing steel framing for support of the building. This method requires jacking and receiving pits on the east and west sides of the building, which must be accessible to the surface. All other work will occur underground and will have little or no effect on the structure during and upon completion of construction. During construction, access to the jacking and receiving pits will require close coordination with the Seafood Center tenants to ensure adequate loading dock space, access around the site, maintenance of power for refrigeration, and parking. Any potential disruption of operations during MBTA construction will require mitigation by the MBTA. The MBTA will work with tenants of the Seafood Center, the CA/T Project, and other adjacent projects as the underpinning scheme is designed to further identify impacts and mitigation. Maintenance of traffic plans during underpinning of the Seafood Center by the MBTA will consider such mitigation measures as accommodation of Center truck traffic in adjacent streets, construction during nighttime hours, off-site parking, and loading area reconfiguration. These maintenance of traffic plans will be coordinated with any plans approved for the CA/T Project.

#### Comment 79:

We are very concerned about the impact of the necessary overhead catenary system for trackless trolley on local streets, and if the technology must be adopted it is essential that careful attention be paid to streetscape design.

#### Response:

The Transitway's surface catenary system will be designed in conjunction with other streetscape elements in the South Boston Piers area. The MBTA is currently working with the South Boston Streetscape Committee which has been convened to develop a design for the Piers area's streetscape; committee members include representatives from the City of Boston, Massport, and CA/T Project. The MBTA will integrate design of the catenary system associated with surface operation of Transitway trackless trolley vehicles with the area's streetscape elements, including lighting, trees, and signage. This integration will ensure compatibility and cohesion of the area's streetscape.

#### Comment 80:

We urge that the trackless trolley selection be reconsidered.

#### Response:

The determination to use trackless trolley technology in implementing the Transitway was made and reported in the FEIS/FEIR. In summary, trackless trolleys were chosen over dual mode buses due to disadvantages associated with the relatively untested buses. These disadvantages include safety, unfamiliarity with operation and maintenance, and procurement difficulties.

#### Comment 81:

The 1998 Interim Bus Service Plan described in the FEIS/FEIR does not provide specific service to World Trade Center, mainly because the World Trade Center Hotel, which will be completed in 1997, will not generate substantial numbers of transit trips. However, the schedule for our proposed office buildings is largely dependent on securing suitable tenants, which in turn depends upon attracting such tenants under a number of criteria including the provision of good transit service. Successful marketing of the office buildings could result in their construction as early as 1997/1998. While the FEIS/FEIR recognizes that additional development could require additional service, we would suggest that the MBTA should commit to extending the Interim Year Service Plan to specifically serve our future developments as and when they are operational.



Such a firm commitment would undoubtedly assist in efforts and negotiations to move our expansion forward, and thereby further stimulate development in the area.

#### Response:

As described in the FEIS/FEIR, the MBTA's interim bus service plan is intended to serve demand generated by the new Federal Courthouse. The courthouse, which includes only 63 parking spaces to support its 816 employees and 2,200 daily visitors, cannot feasibly function without provision of transit service; indeed, approval of courthouse construction was based in part on the presumption of transit service provided by the Transitway, or some interim bus service prior to Transitway implementation. Scheduled to open in 1998, two years in advance of Transitway revenue service on the initial build segment between South Station and the World Trade Center, the Federal Courthouse thus requires operation of surface shuttle buses to support its near-term trip demand.

In contrast, no firm schedule exists for construction of office buildings associated with the World Trade Center expansion. In preparation of the MBTA's interim bus service plan, it was assumed that the World Trade Center shuttles would continue to operate to serve existing and future development at the World Trade Center expansion site. Transitway service by the year 2000 will serve any new development brought online at the World Trade Center. The MBTA appreciates the efforts of private developers such as the John Drew Company to plan future development that is transit-oriented in nature. The eastern terminus of the Transitway at the World Trade Center is likewise intended to support future development planned by the John Drew Company in this area.

#### Comment 82:

World Trade Center clearly has a strong interest in the World Trade Center Station which will be the terminus point of the Transit Project. It is imperative that the design of this station be properly integrated with its surrounding uses, in particular the proposed Massport Garage and the expanded World Trade Center complex. Apart from design issues relating to the structural integration of the station and the transitway alignment with abutting structures, we are concerned that the Transit Project should not prejudice our final development parcel on the west side of Viaduct Street (south of New Congress Street), and are specifically interested in pedestrian connections to and from the station. We would request that World Trade Center be fully consulted throughout the further development of the station design to ensure proper coordination with our own expansion program.

#### Response:

The MBTA is committed to working with the John Drew Company and Massport in developing the Transitway's World Trade Center Station. Coordination is needed with both organizations to ensure that design of the Transitway station is integrated with surrounding uses, including the World Trade Center Expansion and Massport Replacement Parking Garage Projects. The John Drew Company will be fully consulted to ensure proper coordination of the station with their World Trade Center expansion program.

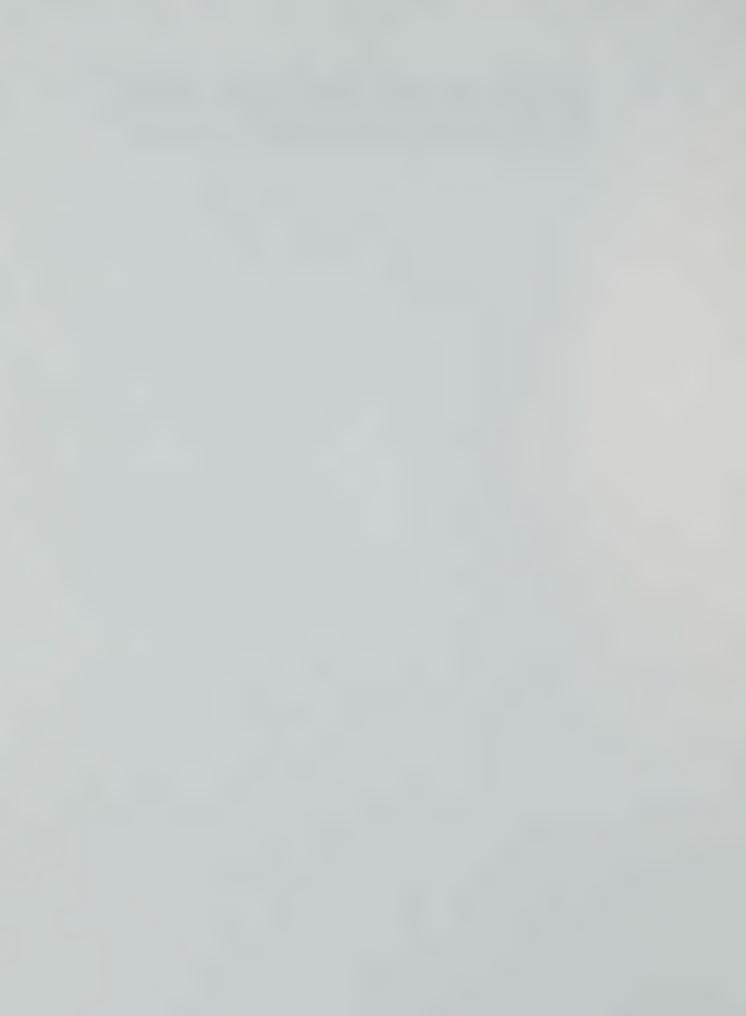
#### Comment 83:

Full coordination is also essential during the construction of the Transit Project, and is particularly critical in light of the complex program of public infrastructure construction activities in the area. Issues of timing, traffic impact and local access must be fully addressed if the viability of the area is to be preserved during the construction period. The FEIS/FEIR references the MBTA's ongoing coordination in this respect with other public agencies, but we would again request that World Trade Center should be fully consulted in the development of construction staging and traffic maintenance plans.



#### Response:

The MBTA has coordinated with the John Drew Company on such issues as Viaduct Street, and both the MBTA and the Company have participated in preparation of the CA/T Project's *South Boston Truck Access and Circulation Study*. The MBTA commits to work with the John Drew Company as design of the Transitway continues and as construction staging and traffic maintenance plans for the area are developed.



JO

Stephen H. Kaiser 101 Hamilton Street Cambridge, Mass. 02139

Mr. Jan H. Reitsma MEPA Director / EOEA 100 Cambridge Street Boston, Mass. 02202 RECEIVED
FEB 1 5 1994
MEPA

SUBJECT: Final Environmental Impact Report
EOEA # 6826 South Boston Transitivay

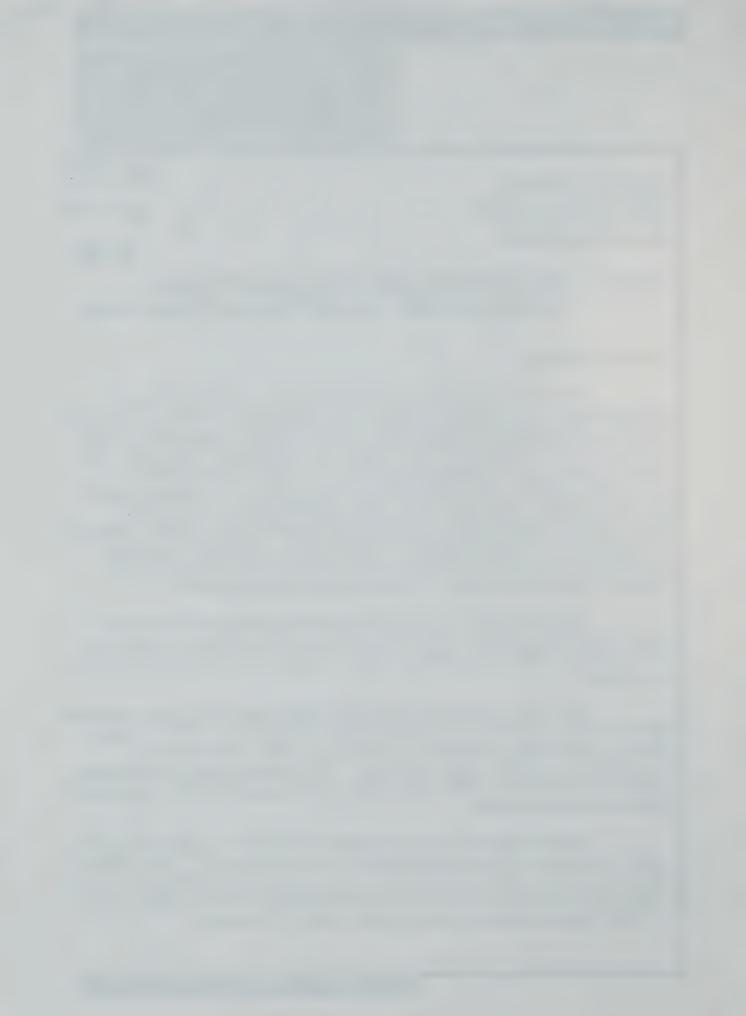
Dear Mr. Reitsma,

The current plans for the Transitway have evolved from an original monorail proposal offered by local developers, including John Drew and other influential entrepreneurs who were hoping to capitalize on the intense development future forecast for the South Boston piers area. The original plan was for a public-private partnership, whereby private companies would pool their resources and construct the elevated transit line, while public agencies would be responsible for the "paperwork" -- effectively the filing of EIRs, wetlands and waterways permit requests, etc. It appeared to be a thoughtful civic contribution -- that the companies which would have the most to gain from the real estate boom in South Boston would contribute to the transportation infrastructure.

The self-interest of the developers was reinforced in a positive way, because improved transportation systems would lessen the expected and prevalent traffic congestion and make their developers more attractive and viable.

However, over the years, this dream of public-private partnership slowly evaporated into a transitway project which is now 100% taxpayer financed, for design, construction and paperwork, with no private contribution -- not even for operations. The financial side of the package appears to be a classic 1980s application of a Reaganite welfare program to benefit fatcat developers.

The situation could be somewhat remedied if a significant public service element were included within the overall proposal. The public element here is not the court house and the prospect of judges and lawyers riding the trolley bus. Instead, it could have been service to distance areas of South Boston which are today poorly served by transit.



Indeed, efforts were made in the 1980s to serve areas of South Boston. The concept was adopted from European experience with electric buses in tunnels. The idea was to combine the advantages of bus circulation in sprawling neighborhoods or suburbs at one end of the line, with high capacity tunnel service at the downtown end of the line. The concept may have been valid and well intentioned, but the execution in the case of the South Boston transitway has been flawed.

84

One drawback inherent in the tunnel-trolley bus concept is the difficult manual operation of buses in the close and twisting confines of tunnels. The long, articulated buses must be guided around curves and Uturns, and down steep grades -- without hitting walls or other obstructions. By comparison, the Harvard Square bus tunnel is short and simple, compared to the lengthy twists and turns of the transitway tunnel.

In my comments on the Draft EIR, I asked about the implications for system reliability -- especially compared to rail-guided LRV service. The response was that the MBTA expects 5-minute response time to have repair trucks on the scene to pull a disabled bus out of the tunnel or to store it temporarily in the bus U-turn loop at South Station. Furthermore, the MBTA states their lack of confidence in new low-floor LRVs ... citing their tendency to derail. This response raises the question of why the MBTA would tolerate unreliable equipment on the Green Line and why they are unable to insist on reliable new technology. It reflects again back on the expected reliability of the transitway electric bus service.

85

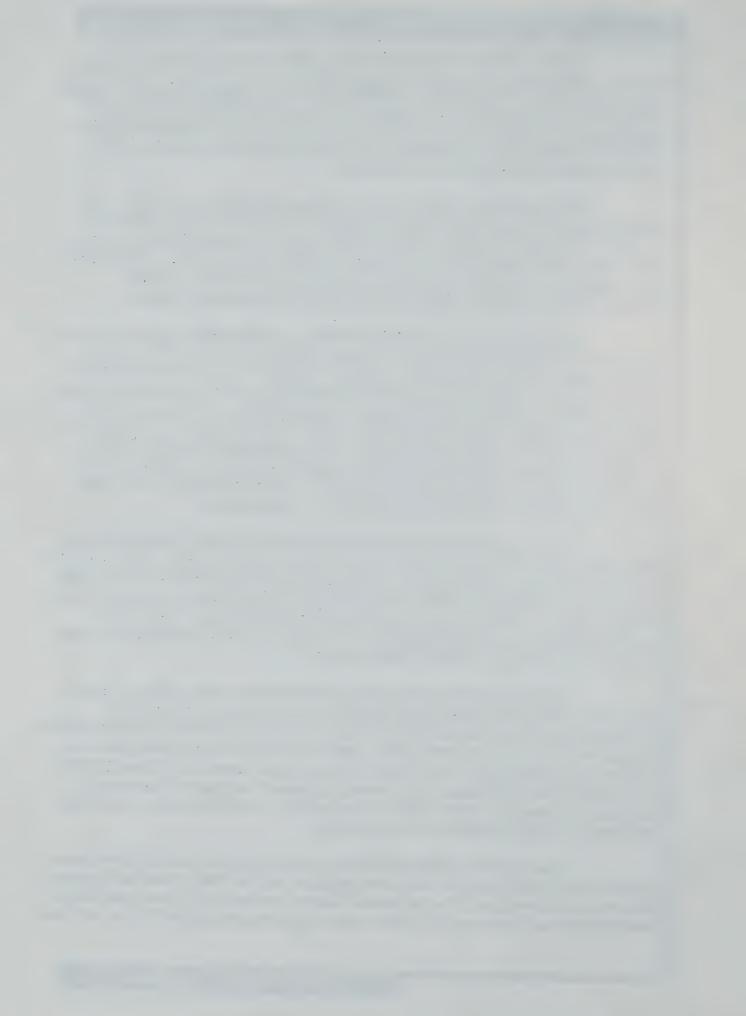
A second drawback of the electric bus is its cumbersome length, due to the hinged or "articulated" nature of its construction. The bus is 60 feet long and pivots like a trailer truck on turns. The result is a very large turning radius which virtually precludes use of these electric buses on South Boston Streets. These long buses have difficulty moving in and out of curbside bus stops and are unable to turn around at the end of most routes because the existing streets are too narrow.

86

A third drawback of any bus service is the uncertainty of route structure. The EIR claims that South Boston bus route #7 would be connected to the new tunnel, thereby providing South Boston residents with transit service. Unfortunately, the buses from the tunnel could instead be routes to the BMIP area and the old Boston Army base site. Since BMIP has considerabel influence and reportedly has already asked for transit service, it is most probable that the bus service would instead go to BMIP and not to South Boston residential areas.

87

The likelihood of South Boston receiving reduced bus service or none at all is reinforced by the poor graphics in the EIR, which fail to show bus route connections into residential South Boston with either specifics or completeness. How can any of the ridership forecasts in the EIR be believed



if the end of line connections are so vague and uncertain, at least as they have been presented in the EIR. If the MBTA has plans to service BMIP or other areas, this should be spelled out in detail, especially since the MBTA reportedly plans to go to construction on the transitway this year.

88

I am also hearing many reports that the ridership figures for the transitway are too high, too optimistic, and possibly intentionally inflated. I have difficulty understanding how effective the proposed service would be, especially considering the claim in Table 4-2 (p. 4-15) that in the morning peak hour transit trips in the year 125% for the No Build. The idea that articulated electric bus service, with uncertain service to South Isoston, would produce almost twice as presenting the figures.

89

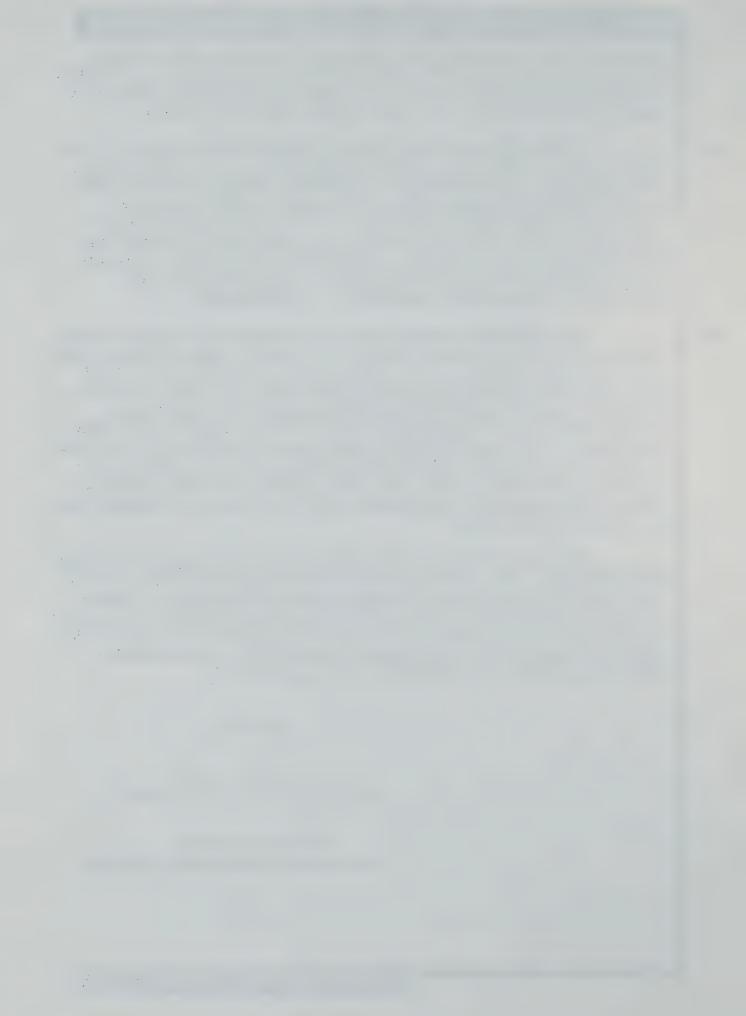
The EIR fails to consider the LNA elternative and seems blindly lefatuated with the articulated electric best accept. I contend that the only salvantage of the electric bus is its ability to a sam more freely over South Boston local streets, thereby providing flexible low-cost service. However, the MBTA's selection of the articulated bus negates this advantages, because of the excessive length of the vehicle and the large turning radius. The rolling and guidance reliability of steel-wheel-on-steel-rail has been lost through the bus concept, and the MBTA fails to seize the opportunity for excellence by deriding new low-floor LRVs as likely to derail. In France and other countries, they have low-floor LRVs in service, and reliability has been amply demonstrated.

In my experiences with the Charles River Crossing and the North-South Rail Link, state officials are constantly using excuses that new ideas "can't be done" and seem quite willing to accept uninspiring and flawed substitutes for excellence. I believe that the proposed transit service should be planned for LRV rolling stock from day one and that the concept of the articulated electric bus concept should be abandoned as inappropriate, inflexible and inefficient in its delivery of transit services.

Sincerely,

Stephen H. Kaiser

Traffic and Transportation Engineer



# Stephen H. Kaiser

Comment 84:

One drawback inherent in the tunnel-trolley bus concept is the difficult manual operation of buses in the close and twisting confines of tunnels. The long, articulated buses must be guided around curves and U-turns, and down steep grades — without hitting walls or other obstructions. By comparison, the Harvard Square bus tunnel is short and simple, compared to the lengthy twists and turns of the transitway tunnel.

Response:

The Transitway tunnel is being designed for the handling characteristics of the trackless trolley vehicle. Operators will be trained in the safe operation of vehicles.

Comment 85:

A second drawback of the electric bus is its cumbersome length, due to the hinged or "articulated" nature of its construction. The bus is 60 feet long and pivots like a trailer truck on turns. The result is a very large turning radius which virtually precludes use of these electric buses on South Boston Streets. These long buses have difficulty moving in and out of curbside bus stops and are unable to turn around at the end of most routes because the existing streets are too narrow.

Response:

Only three surface routes have been proposed for trackless trolley operations. These routes include one operating to the Boston Marine Industrial Park (BMIP) via D Street, Northern Avenue, Harbor Street, Drydock Avenue, and Tide Street; one operating to Summer Street via D Street, Fargo Street, and Summer Street; and a third, which will be operated in the full build Transitway configuration only, which operates via D Street, First Street, P Street, West Broadway, and L Street.

Given the articulated feature of the vehicle, the 60-foot trackless trolley proposed for operation as part of the Transitway Project has a turning radius equivalent to that of a standard 40-foot bus. The MBTA has conducted on-street analysis of the proposed surface Transitway routes to ensure that the routes are operable. The trackless trolley vehicle will be able to negotiate all required turns, although some minor intersection geometry modifications may be required along the proposed residential South Boston route to facilitate surface operation.

Comment 86:

A third drawback of any bus service is the uncertainty of route structure. The EIR claims that South Boston bus Route 7 would be connected to the new tunnel, thereby providing South Boston residents with transit service. Unfortunately, the buses from the tunnel could instead be routed to the BMIP area and the old Boston Army Base site. Since BMIP has considerable influence and reportedly has already asked for transit service, it is most probable that the bus service would instead go to BMIP and not to South Boston residential areas.

Response:

The Transitway service plan has been designed to serve all areas of the developing South Boston Piers area. In its initial build configuration, underground Transitway stations will be located at the new Federal Courthouse/Fan Pier and at World Trade Center. Two surface routes, one serving BMIP and the other serving the Summer Street area, will be provided beyond the Transitway's portal at D Street. Once the Transitway is extended to Boylston Station in its full build configuration, a third surface route will be added to residential South Boston.

The three Transitway surface routes have been designed to serve future demand at BMIP, Summer Street, and residential South Boston. Detailed service plans for each of these routes have been provided in the FEIS/FEIR. The MBTA strongly disagrees



with the assertion that the residential South Boston route will be eliminated in favor of additional service to BMIP. The operating plan for the BMIP route provides adequate service to meet projected demand at the industrial park; likewise, the residential South Boston route is intended to serve demand in City Point area neighborhoods.

### Comment 87:

The likelihood of South Boston receiving reduced bus service or none at all is reinforced by the poor graphics in the EIR, which fail to show bus route connections into residential South Boston with either specifics or completeness. How can any of the ridership forecasts in the EIR be believed if the end of line connections are so vague and uncertain, at least as they have been presented in the EIR. If the MBTA has plans to service BMIP or other areas, this should be spelled out in detail, especially since the MBTA reportedly plans to go to construction on the transitway this year.

# Response:

Again, the MBTA questions the perception that the residential South Boston route will be eliminated in favor of additional service to BMIP. However, the MBTA agrees that graphics provided in the FEIS/FEIR have not adequately depicted the proposed residential South Boston route. This route will operate via D Street, First Street, P Street, West Broadway, and L Street. All ridership projections have incorporated this route, in addition to the two Piers area surface routes. A graphic showing all three Transitway surface routes has been provided in the Draft Section 61 Finding. This information has been widely presented at public meetings held by the MBTA.

#### Comment 88:

I am also hearing many reports that the ridership figures for the transitway are too high, too optimistic, and possibly intentionally inflated. I have difficulty understanding how effective the proposed service would be, especially considering the claim in Table 4-2 (page 4-15) that in the morning peak hour transit trips in the year 2010 could achieve a modal percentage of 62 percent of all trips, compared to 25 percent for the No Build. The idea that articulated electric bus service, with uncertain service to South Boston, would produce almost twice as many trips as cars, is simply implausible. I do not believe the MBTA ridership figures.

# Response:

The MBTA is unaware of the referenced reports. Ridership for the Transitway Project has been prepared according to guidelines established by the Federal Transit Administration (FTA) for transit alternatives analysis, and all methodologies and results have been carefully scrutinized, reviewed, and approved by FTA. Again, the MBTA questions the perception that the residential South Boston route is uncertain. This route has been included in all phases of planning and analysis for the Transitway.

#### Comment 89:

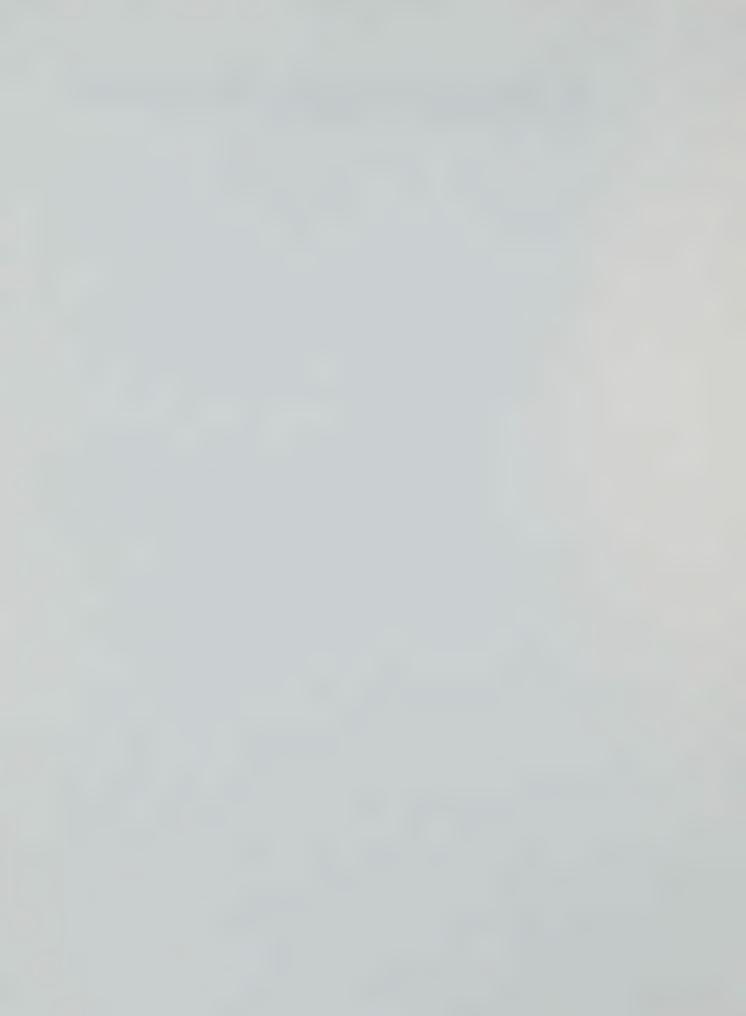
The EIR fails to consider the LRV alternative and seems blindly infatuated with the articulated electric bus concept. I contend that the only advantage of the electric bus is this ability to roam more freely over South Boston local streets, thereby providing flexible low-cost service. However, the MBTA's selection of the articulated bus negates this advantage, because of the excessive length of the vehicle and the large turning radius. The rolling and guidance reliability of steel-wheel-on-steel-rail has been lost through the bus concept, and the MBTA fails to seize the opportunity for excellence by deriding new low-floor LRVs as likely to derail. In France and other countries, they have low-floor LRVs in service, and reliability has been amply demonstrated.

# Response:

Following extensive analysis of alternative transit modes and alignments, the MBTA has concluded that trackless trolley vehicles will provide efficient, productive, and flexible service in an underground tunnel and on surface streets. This analysis and screening process has been comprehensive and open, involving input from federal, state, and local agencies, businesses and community groups, and private citizens. A low-floor vehicle has been proposed to facilitate passenger boarding and alignment at



station platforms and curbside on surface routes. Furthermore, the Transitway has been designed to be compatible with a potential conversion to light rail if a future change in Piers area demand characteristics warrant.



# MBTA Advisory Board

120 Boylston Street, Boston, Massachusetts 02116

617/426-6054 FAX 617/451-2054

January 20, 1994

Ms. Mary Beth Mello
Deputy Administrator
Federal Transit Administration - Region I
U.S. Department of Transportation
55 Broadway, Kendall Square
Cambridge, MA 02142

RE: South Boston Piers/Fort Point Channel Transit Project, EOEA #6826

Dear Ms. Mello:

On behalf of the MBTA Advisory Board, the Capital Planning Committee has reviewed the FEIS/R on the South Boston Piers/Fort Point Channel Transit Project.

As was stated in the comments submitted on this project's DEIR/SDEIR, the Advisory Board supports this major project and believes that the MBTA must proceed with the project in order to realize the savings opportunity from coordinating construction of the transitway with the design and construction of the Central Artery.

The Capital Planning Committee continues to wrestle with the question of whether it is wise to allocate limited funds to a major project which will serve a potential future need, rather than to give top priority to projects aimed at serving current demand. This uncertainty is further fueled by the lack of an updated Program for Mass Transportation which prioritizes projects based upon their merits.

Important factors in the Board's decision to support the transitway included the significant commitment of federal funds at the time of the DEIR review, the importance of stimulating economic development and job growth in the core area, and the existence of a phased plan that can be incrementally implemented as the actual level of demand becomes clearer. At this time the Capital Planning Committee maintains the belief that the project, overall, could be a vital link in the public transit network -- particularly when the South Station to Boylston segment is completed. However, we are not without concern.



Page 2 Mary Beth Mello January 20, 1994

After an extensive review of the Financial Feasibility Analysis provided in Chapter 6, it is clear that the analysis is based on a series of very optimistic assumptions:

- Assumption of federal funding allocation of 80% of project costs.
- The FEIR clearly states that the federal share of this project has decreased from an 80% share to a 64% share due to increased project costs. Not only do looming federal budget cuts jeopardize the existing "earmarked" funds for this project (the 64%), but they also severely diminish the possibility of additional funding being allocated. Given that the financial feasibility is predicated on an 80%/20% federal local match, the analysis ignores current, available and stated information.
  - Average annual growth in State Assistance to the MBTA of 5.1%.
- Using the assumption that state assistance will grow on an average annual basis of 5.1% is a more realistic assumption than the 8.1% in the DEIR. However, the real increases in the state assistance numbers illustrated in table 6-3 show that state assistance would have to grow by 9.7% from FY95 to FY96, 8.5% in FY97, 6.8% in FY98, 4.9% in FY99 and 9.6% in FY2000 in order to support MBTA service and these necessary increases in the level of state assistance occur BEFORE the Fan Piers Project begins operating. Clearly, a 5.1% average annual growth in state assistance obscures the commitment needed by the Commonwealth to support MBTA service in the near term, before and after this project begins operation.
  - Assumptions of fare revenue growth for current service of 4.3%.
- Fare revenue for current service is projected to grow on an average annual basis by 4.3% from FY93 to FY2015. Historical trends indicate that fares grew by 3.31% from FY84 FY93 -- in a period which enjoyed major ridership increases as well as two fare increases. It is clear that the optimistic fare revenue figure was calculated based upon the projection of increasing fare recovery ratios; however, the Capital Planning Committee remains concerned that these figures are not reasonable given historic trends and mandates to keep fares moderate and ridership high.

- Debt Service as a percentage of the MBTA's budget.
- The Capital Planning Committee notes that the financial feasibility analysis shows debt service as a percentage of the total current expenses growing by 16 points from FY93 to FY2015, or from 30% of total current expenses in FY93 to over 46% in FY2015. Infrastructure investment and re-investment is a necessary expenditure. Nonetheless, capital spending levels should not be allowed to consume an ever increasing percentage of the MBTA's total operating budget.

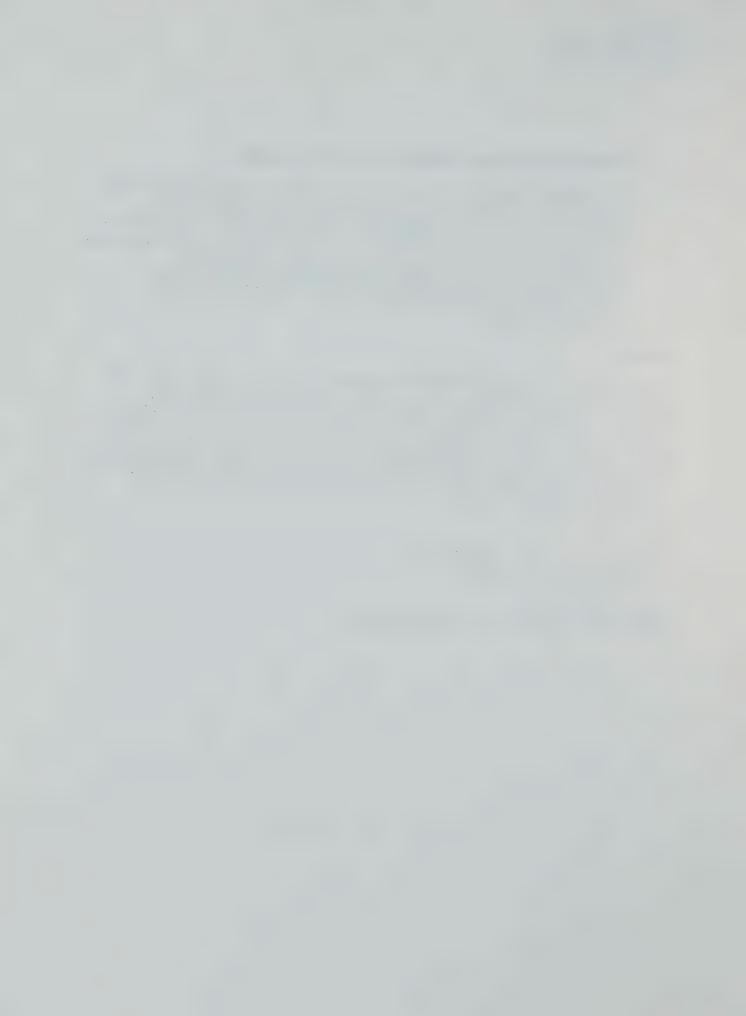
# Summary

The Capital Planning Committee recognizes the constrained window of opportunity for significant savings, but remains concerned that the financial feasibility analysis is flawed. It is not clear from this analysis that the MBTA has the necessary financial resources to fund this project and maintain current services. Continued Advisory Board support for the South Boston Piers/Fort Point Channel Transit Project rests on the level of commitment the federal government and the Commonwealth offer to support the MBTA's budget.

Sincerely,

Patrick Reffett

Chairman, Capital Planning Committee



# **MBTA Advisory Board**

### Comment 90:

The FEIR clearly states that the federal share of this project has decreased from an 80 percent share to a 64 percent share due to increased project costs. Not only do looming federal budget cuts jeopardize the existing "earmarked" funds for this project (the 64 percent), but they also severely diminish the possibility of additional funding being allocated. Given that the financial feasibility is predicated on an 80 percent/20 percent federal local match, the analysis ignores current, available and stated information.

# Response:

The FEIS/FEIR acknowledges that the current level of federal funding authorized for the Transitway Project in the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) is only 64 percent of the total initial build segment costs. The MBTA is confident that the currently authorized amount of \$278 million will be appropriated to the project. A Full Funding Grant Agreement between the FTA and the MBTA is under preparation that establishes a schedule for these appropriations.

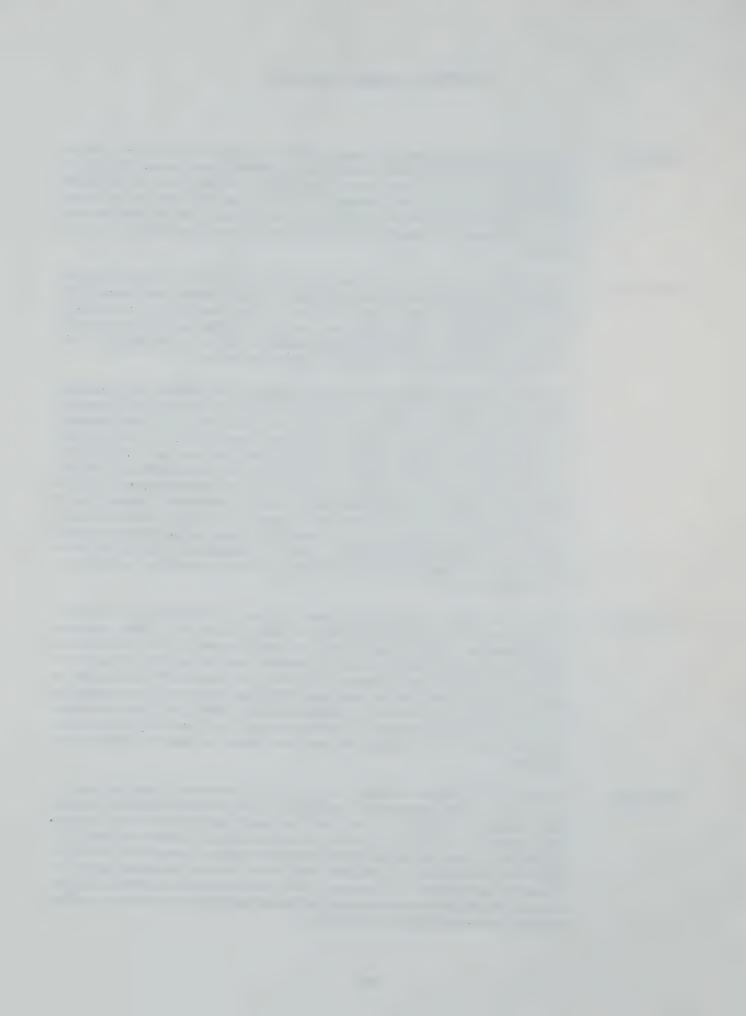
Furthermore, the MBTA is aggressively pursing additional authorization to increase the federal share for the Transitway initial build segment to 80 percent. An 80 percent federal/20 percent local funding apportionment was established at the project's outset, and the current authorization of \$278 million was based on those funding shares. However, due to unavoidable changes, many of which are associated with the CA/T Project, Transitway project costs have increased since federal authorization was stipulated in ISTEA. To restore the federal share to the 80 percent level, an ISTEA reauthorization proposal was submitted to the Surface Transportation Subcommittee of the House Public Works Committee on January 7, 1994. This proposal, which requests additional funding for the Transitway Project, has considerable support and backing by our Congressional delegation. The MBTA anticipates a favorable response to the proposal, and expects continued federal participation throughout all phases of the Transitway Project.

### Comment 91:

Using the assumption that state assistance will grow on an average annual basis of 5.1 percent is a more realistic assumption than the 8.1 percent in the DEIR. However, the real increases in the state assistance numbers illustrated in Table 6-3 show that state assistance would have to grow by 9.7 percent from FY95 to FY96, 8.5 percent in FY97, 6.8 percent in FY98, 4.9 percent in FY99 and 9.6 percent in FY2000 in order to support MBTA service — and these necessary increases in the level of state assistance occur BEFORE the Fan Piers Project begins operating. Clearly, a 5.1 percent average annual growth in state assistance obscures the commitment needed by the Commonwealth to support MBTA service in the near term, before and after this project begins operation.

# Response:

As shown in the financial analysis prepared for the Transitway Project, the average annual growth in state assistance to the MBTA is projected to be 5.1 percent between 1993 and 2015. It should be noted that this growth rate represents a significant improvement over the average annual rate of 8.1 percent assumed in the DEIS/SDEIR, due in large part to recent MBTA budget initiatives to control the Authority's reliance on state support. In some intervening years, however, the annual growth will exceed the average rate of 5.1 percent. These relatively few near-term exceedances are due to federal and state mandates that require the MBTA to undertake a number of capital improvements to its transit system.



Specifically, adherence to federal legislation such as the Americans with Disabilities Act (ADA) and the Clean Air Act and Amendments (CAAA) will require a capital investment of \$2.1 billion over the next seven years. These mandated capital improvements place a burden on the MBTA's budget in the next five years, which will require a short-term increase in state assistance. It is these efforts combined with maintenance of the MBTA's existing system, not investment in the Transitway Project, that causes the temporary near-term fluctuations in the growth of state assistance.

### Comment 92:

Fare revenue for current service is projected to grow on an average annual basis by 4.3 percent from FY93 to FY2014. Historical trends indicate that fares grew by 3.31 percent from FY84 to FY93 – in a period which enjoyed major ridership increases, as well as two fare increases. It is clear that the optimistic fare revenue figure was calculated based upon the projection of increasing fare recovery ratios; however, the Capital Planning Committee remains concerned that these figures are not reasonable given historic trends and mandates to keep fares moderate and ridership high.

# Response:

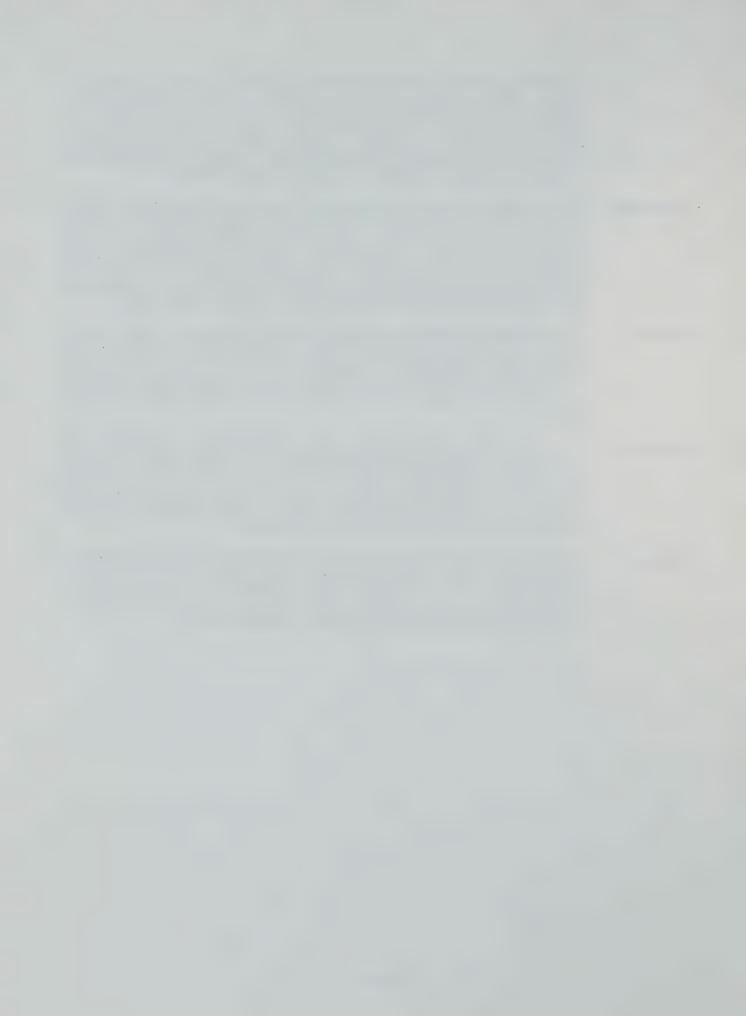
It is anticipated that ridership growth on the MBTA's current system will be positively impacted by construction of the CA/T Project. The MBTA also anticipates that such ridership gains will increase the fare revenue growth rate from the current 3.31 percent to 4.3 percent in the future. These projections in fare revenue are consistent with the projected 15 to 20 percent increase in ridership for the current system by the year 2010.

### Comment 93:

The Capital Planning Committee notes that the financial feasibility analysis shows debt service as a percentage of the total current expenses growing by 16 points from FY93 to FY2015, or from 30 percent of total current expenses in FY93 to over 46 percent in FY2015. Infrastructure investment and re-investment is a necessary expenditure. Nonetheless, capital spending level should not be allowed to consume an ever increasing percentage of the MBTA's total operating budget.

# Response:

The MBTA acknowledges that debt service is projected to claim an increasing share of the MBTA's budget. Continuing investment in the system is necessary, as is complying with federal and state mandates, and addressing the increased regional transportation needs. The substantial capital investment associated with these factors will inevitably result in a greater borrowing and debt service burden.





# The Commonwealth of Massachusetts Executive Office of Environmental Affairs 100 Cambridge Street Boston, Massachusetts 02202

MEMORANDUM

From:

Jan Reitsma, Director, MEPA Unit/ Margaret M. Brady, Director, MCZM

February 14, 1994

Date: Re:

EOEA # 6826 South Boston Piers Transit Project FEIR;

The Massachusetts Coastal Zone Management (MCZM) Office has completed its review of the above-referenced Final Environmental Impact Report (FEIR), noticed in the Environmental Monitor dated January 10, 1994, and finds that there are significant issues that have yet to be decided by the applicant. Instead, however, of recommending a Supplemental Final Environmental Impact Report, MCZM recommends that the following matters be addressed in a draft Section 61 Finding.

# Designated Port Area (DPA)

94 The applicant has yet to decide whether to take the New England Seafood Center or to underpin it. The FEIR does not discuss the impacts of the alternatives, nor does it indicate the preferences of the Center's owners. Generally, MCZM would find it difficult to support an option which involved the taking of a maritime, water dependent use in a Designated Port Area. However, in its description of the Center, the applicant mentions that the co-op members want any new construction to be located near the Fish Pier -- does this mean that a specific relocation proposal has been made to the co-op? If so, what is the proposal and what has been the response? MCZM would find taking of the Seafood Center acceptable only if the co-op owners supported a specific relocation plan.

Similarly, the applicant has not selected a proposed location for 95 the storage and maintenance facility associated with this project. The FEIR does not discuss the impacts of alternatives, however selection of the Summer Street/Pappas Way alternative would entail taking the Subaru overflow lot on that site. As this is an activity which supports the maritime activities of the DPA, this does not appear to be an acceptable alternative.

96 The applicant has written a good deal about their concern for traffic issues, however, the FEIR does not clarify impacts of



construction traffic on DPA traffic. The Massachusetts Highway Department (MHD) is currently preparing a study of the impacts of the Central Artery project on the DPA which does not include impacts from the Transitway project. MCZM recommends that the applicant either provide appropriate data to MHD for inclusion in their report or that they update the MHD study as soon as the data are available.

# Dredging and Dredged Material Disposal

97 The applicant has completed significantly more analysis of sediments in the project area. A construction methodology for work in Fort Point Channel had not been selected. Based on the information provided, MCZM recommends the selection of the coffer dam alternative. This method appears to minimize impacts to water dependent users in Fort Point Channel.

The applicant is reminded that MCZM exerts federal consistency jurisdiction over the Section 103 permit for disposal of dredged material at the Massachusetts Bay Disposal Site.

# Navigation

Because it eliminates impacts to navigation, as well as eliminating impacts to water circulation in Fort Point Channel, MCZM supports the applicant's alternative routing of the Transitway under Russia Wharf.

# Federal Consistency

98 The applicant is reminded that the proposed project is subject to MCZM federal consistency review. Further information about this process may be obtained from Jane W. Mead, MCZM Project Review Coordinator, at 617-727-9530 x418.

# MMB/JWM

cc: John Simpson, Section Chief,
Waterways Regulation Program, Massachusetts DEP
James Sprague, Section Chief,
Northeast Regional Office, Massachusetts DEP



# **Massachusetts Coastal Zone Management**

## Comment 94:

The applicant has yet to decide whether to take the New England Seafood Center or to underpin it. The FEIR does not discuss the impacts of the alternatives, nor does it indicate the preferences of the Center's owners. Generally, MCZM would find it difficult to support an option which involved the taking of a maritime, water-dependent use in a Designated Port Area. However, in its description of the Center, the applicant mentions that the co-op members want any new construction to be located near the Fish Pier — does this mean that a specific relocation proposal has been made to the co-op? If so, what is the proposal and what has been the response? MCZM would find taking of the Seafood Center acceptable only if the co-op owners supported a specific relocation plan.

# Response:

The New England Seafood Center is located on a 4.4-acre parcel at 145 Northern Avenue and is bordered by the East Service Road on the west, B Street on the east, and Congress Street (and the proposed New Congress Street) on the south. The land and building are owned by eight partners of the Massachusetts partnership known as the New England Seafood Center Associates.

The Center consists of a brick and concrete structure containing fish processing and wholesale distribution companies, as well as a nightclub in the northernmost portion of the building. The building contains approximately 85,600 square feet and was built in two sections. The section that fronts on Northern Avenue was constructed in 1954, and the rear portion was constructed in 1970.

The building has loading docks on the east, west, and south sides. Truck access is maintained around the entire building. The non-fish tenant, the nightclub known as "Polly-Estas," also has a loading dock where beverages are handled. All loading docks required for fish processing require refrigeration. The portion of the lot that is not utilized by either the building, access ways, or loading docks is occupied by parking spaces used by employees and occasional visitors. In the evening, the lot is also used by patrons of the nightclub.

Two options have been considered relative to the construction of the Transitway Project through the New England Seafood Center property. These include acquiring the Seafood Center and subsequently demolishing it during construction, or structurally underpinning the building and constructing the Transitway tunnel beneath it. Although the building does not lie within the South Boston Designated Port Area (DPA), it does lie within Chapter 91 jurisdictional boundaries. Acquisition and demolition of the building would therefore require the relocation of all tenants. Additionally, building demolition would result in an expansion of the anticipated area of construction-related disruption and an increase in the project-related volume of demolition wastes. Underpinning would not require the relocation of tenants and would avoid the associated impacts of building demolition.

Upon completion of the project's FEIS/FEIR, the MBTA further investigated two options for the New England Seafood Center, working closely with agencies such as the Massachusetts Port Authority (Massport), Massachusetts Highway Department (MHD) and the CA/T Project, Boston Transportation Department (BTD), Boston Redevelopment Authority (BRA), and Economic Development and Industrial Corporation (EDIC), as well as with the Seafood Center owners and occupants. Issues regarding future land uses, roadway improvements, construction schedules,



and costs were discussed and evaluated. Since this coordination effort did not result in an acquisition plan that was acceptable to all parties, the MBTA proposes to underpin, rather than acquire, the New England Seafood Center. Underpinning, which will not require the relocation of Seafood Center tenants, is technically feasible and is less expensive than an acquisition.

The MBTA recognizes that construction of the Transitway tunnel through the New England Seafood Center property will require coordination with a number of parties, including area property owners, adjacent businesses, and nearby construction projects. A conceptual design for the proposed underpinning of the Seafood Center consists of jacking pipepiles under the existing foundation and constructing steel framing for support of the building. This method requires jacking and receiving pits on the east and west sides of the building, which must be accessible to the surface. All other work will occur underground and will have little or no effect on the structure during and upon completion of construction. During construction, access to the jacking and receiving pits will require close coordination with the Seafood Center tenants to ensure adequate loading dock space, access around the site, maintenance of power for refrigeration, and parking. Any potential disruption of operations during MBTA construction will require mitigation by the MBTA. The MBTA will work with tenants of the Seafood Center, the CA/T Project, and other adjacent projects as the underpinning scheme is designed to further identify impacts and mitigation. Maintenance of traffic plans during underpinning of the Seafood Center by the MBTA will consider such mitigation measures as accommodation of Center truck traffic in adjacent streets, construction during nighttime hours, off-site parking, and loading area reconfiguration. These maintenance of traffic plans will be coordinated with any plans approved for the CA/T Project.

### Comment 95:

Similarly, the applicant has not selected a proposed location for the storage and maintenance facility associated with this project. The FEIR does not discuss the impacts of alternatives, however selection of the Summer Street/Pappas Way alternative would entail taking the Subaru overflow lot on that site. As this is an activity which supports the maritime activities of the DPA, this does not appear to be an acceptable alternative.

# Response:

In the FEIS/FEIR, the MBTA analyzed two potential sites for the Transitway Project's maintenance and storage facility. Site A is located at the corner of Summer Street and Pappas Way, while Site B is located on West First Street between E Street and Pappas Way; both sites are located within Chapter 91 jurisdiction. These two sites were screened from a larger number of potential sites, and both were deemed appropriate for location of a maintenance and storage facility to support the Transitway Project.

After several meetings with Massport and Pappas Management Corporation, the owners or representatives of the owners of the two sites under consideration, the MBTA has selected Site B on West First Street for location of the Transitway Project's maintenance and storage facility. The site is preferable over Site A given that no impact to existing water-dependent uses would result. Site B also meets several other important design criteria:

Selection of this site will not displace any existing water-dependent use. This
criterion is particularly important, since the economic vitality of South Boston
depends in large part on the area's water-dependent businesses and industries. A
portion of Site A located at the corner of Summer Street and Pappas Way is
currently used for Subaru overflow vehicle parking; since these vehicles are



transported by water, this overflow parking lot is determined to be a water-dependent use. Although Site B is also within Chapter 91 jurisdiction, it does not contain any existing water-dependent uses. It is, therefore, a more desirable location for the Transitway's maintenance facility. Tenants of the site, which is predominantly owned by Massport and partially owned by Atlantic, Inc., include Fortress Records, Corporate Printing Company, Shaughnessy Warehouse, Roadway Trucking, PPG Industries, Yankee Bus, Emerson College, NYNEX, U.S. Postal Service parking, Boston Harbor Industrial Development Corporation, and E Street Associates.

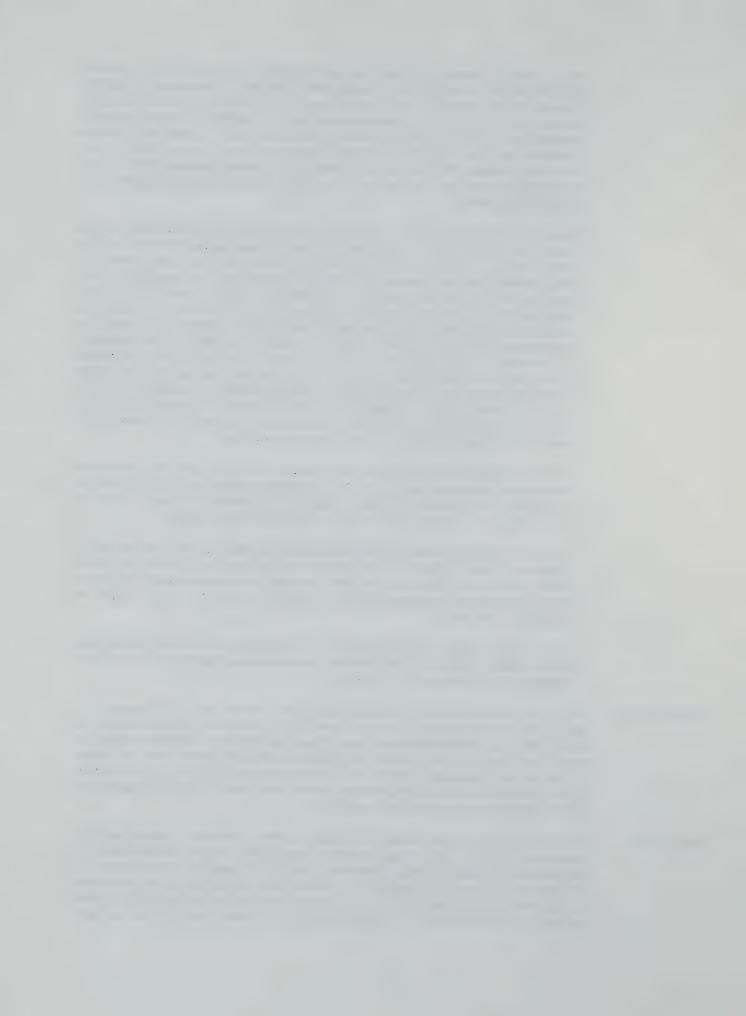
- The site is roughly one-half mile from the Transitway portal, and is located along a future Transitway route to residential South Boston as part of the full build configuration. This location thus minimizes non-revenue producing trips (i.e., "deadheading") for transit vehicles beginning or ending their service routes. It also reduces the need to install additional catenary (overhead wires that provide electrical power to the trackless trolley vehicles) as part of the full build Transitway to extend surface service into residential South Boston; catenary will simply be extended from the West First Street facility. The ability to utilize the same catenary for non-revenue trips to the maintenance facility and revenue trips into residential South Boston as part of the full build Transitway will reduce both one-time construction and ongoing operating and maintenance costs. In addition, combined use of the catenary will limit potential adverse environmental impacts, including visual and aesthetic impacts of the overhead catenary and support structures. This is an important issue as the Piers area streetscape evolves.
- The surrounding area is compatible with activities associated with the Transitway's maintenance and storage facility. The site is adjacent to other light industrial development, and the area in which it is located is expected to remain in such use for the long term. No residential or commercial areas will be affected.
- The site is physically suited to development as a maintenance and storage facility.
  There are a few structures on the site that would need to be removed. Utility
  service is adequate, eliminating the need for costly infrastructure work. The parcel
  is regularly shaped, enabling efficient use of the parcel for construction and
  operation of the facility.
- No hazardous waste spills or releases were identified at this site, based upon review of files of the U.S. Environmental Protection Agency and the Massachusetts Department of Environmental Protection.

## Comment 96:

The applicant has written a good deal about their concern for traffic issues, however, the FEIR does not clarify impacts of construction traffic on Designated Port Area (DPA) traffic. The Massachusetts Highway Department (MHD) is currently preparing a study of the impacts of the Central Artery project on the DPA which does not include impacts of the Transitway project. MCZM recommends that the applicant either provide appropriate data to MHD for inclusion in their report or that they update the MHD study as soon as the data are available.

### Response:

Data on truck traffic associated with construction of the Transitway Project (including volumes of trucks by time of day, routings, detours, etc.) will not be available until design of the project is further advanced. The MBTA's design consultants will be responsible for preparing maintenance of traffic plans to be used by the contractor during construction. The MBTA is aware of and sensitive to the importance of truck access to and from the DPA, and all maintenance of traffic plans will be subject to



review and approval by agencies such as MCZM. Furthermore, these plans will reflect maintenance of traffic plans established and approved for the CA/T Project. The MBTA coordinated with the CA/T Project during preparation of its final South Boston Truck Access and Circulation Study completed in April 1994, and is currently participating in the revised study which incorporates design changes to be documented by the CA/T Project in a forthcoming Notice of Project Change.

Although data on Transitway construction truck traffic is not yet available for incorporation in the CA/T Project's revised truck study, the effect of these additional trucks is not expected to have a major impact on DPA traffic. To test this assertion, a sensitivity analysis was performed by the CA/T Project in response to questions about the impact of other construction activities on traffic in the DPA. This analysis noted that truck trips associated with other construction sites are projected to be extremely low relative to the total traffic volumes projected on streets in South Boston. For example, the Draft Environmental Impact Report for the World Trade Center project (considered a major project in South Boston) estimates that during peak construction, a total of 84 truck trips per day would be generated. During the peak hour of the World Trade Center project peak construction activity, a total of 20 truck trips is expected. This represents less than one percent of the projected approach volume at the intersection of Northern Avenue and D Street in 1996.

To test the impact of much higher truck volumes, the CA/T Project added 100 trucks to the D Street/Summer Street intersection in a single hour (25 trucks on each approach) in 1996. The impact was negligible, with the average overall delay for the intersection increasing from 13 seconds to 14 seconds; there is no impact on level of service. The sensitivity analysis thus indicates that the addition of significant truck volumes has little impact in terms of level of service.

The CA/T Project analysis also points out that conservative trip generation is built into the 1996 traffic volumes. Actual development in South Boston is currently lagging behind the projected development that was estimated in 1989. The result is that the traffic model overestimates trip generation in South Boston at sites where development has lagged.

### Comment 97:

The applicant has completed significantly more analysis of sediments in the project area. A construction methodology for work in Fort Point Channel had not been selected. Based on the information provided, MCZM recommends the selection of the cofferdam alternative. This method appears to minimize impacts to water-dependent users in Fort Point Channel.

# Response:

The MBTA has met with the U.S. Army Corps of Engineers (USACOE), Massachusetts Coastal Zone Management (MCZM), Department of Environmental Protection (DEP), and the Conservation Law Foundation to discuss the Fort Point Channel crossing construction methods. Based on these meetings and analysis of both the immersed tube and cofferdam construction methods, the MBTA has selected the semi-confined concrete immersed tube construction method over the cofferdam as the preferred alternative for the crossing of the Fort Point Channel. This method minimizes total construction duration, in-water construction duration, and costs, and enhances the ability to successfully mitigate environmental impacts. Specifically, the semi-confined concrete immersed tube can be constructed 11 to 13 months faster than the cofferdam; has a 30-week, versus a 68-week, in-water construction period; is estimated to cost \$3.5 million less than the cofferdam method; and can be constructed in an environmentally sound manner, as discussed below. In addition, the use of



semi-confined dredging techniques will limit dredged material volumes to amounts similar to those resulting from the cofferdam method.

Immersed tube construction involves channel dredging within a semi-confined area. Two parallel rows of steel sheeting will be driven into the channel bed along the alignment to preclude the necessity of side-sloping excavation. This sheeting will extend approximately six inches above the channel bottom. The channel bed between the rows of sheeting will then be excavated, or dredged, to the necessary depth. Upon proper preparation of the channel bed, a single tube section, constructed off-site and sealed at each end, will be floated into position over the dredged alignment and lowered (or "sunk") into place. Crossing of the channel will require three such sections and will result in a navigational constraint of approximately one-half the width of the channel at any given time. Upon completion of construction, the tunnel will be covered with clean, compatible materials.

The cofferdam construction method differs from the immersed tube method in that all construction would occur in place. This method would have entailed installation of a sheet pile cofferdam across one-half of the Fort Point Channel, while leaving the remaining half of the channel open for tidal flushing and navigation. Once the cofferdam was installed, the confines of the cofferdam would be cross-braced, dewatered, and excavated to the tunnel design depth; the Transitway tube would then be cast in place. Upon completion of the first half of the channel tunnel, the cofferdam would be removed and construction of the second half of the tunnel initiated. During this process, a portion of the first cofferdam would need to remain in place to maintain continuity between the two halves of the cofferdam crossing. Upon completion of the channel crossing, sheet piles used for the cofferdam would be cut at the mud line and left in place to ensure soil stability in the immediate vicinity of the tunnel.

In accordance with USACOE requirements, Tier I (data review) and Tier II (chemical evaluation) reports have been prepared that include descriptions of the Fort Point Channel crossing construction methodologies and sequencing, existing sediment conditions, and sediment dredging and disposal requirements and alternatives. A MCZM Federal Consistency Certification Statement, USACOE Section 404 Permit Application, and Section 401 Water Quality Certification have been filed which detail the construction methodology, sequencing, impacts, and mitigation measures for the preferred crossing method. A MCZM Federal Consistency Certification Statement, USACOE Section 404 Permit Application, and Section 401 Water Quality Certification have been filed which detail the construction methodology, sequencing, impacts, and mitigation measures for the preferred immersed tube channel crossing method.

The impact of increased levels of suspended solids on water quality during dredging is the most significant potential impact of the preferred channel crossing method. However, these impacts can be successfully mitigated through the use of silt curtains, modified dredging techniques, and continual water quality monitoring. The MCZM consistency review and the USACOE permit applications referenced above detail mitigation measures that include:

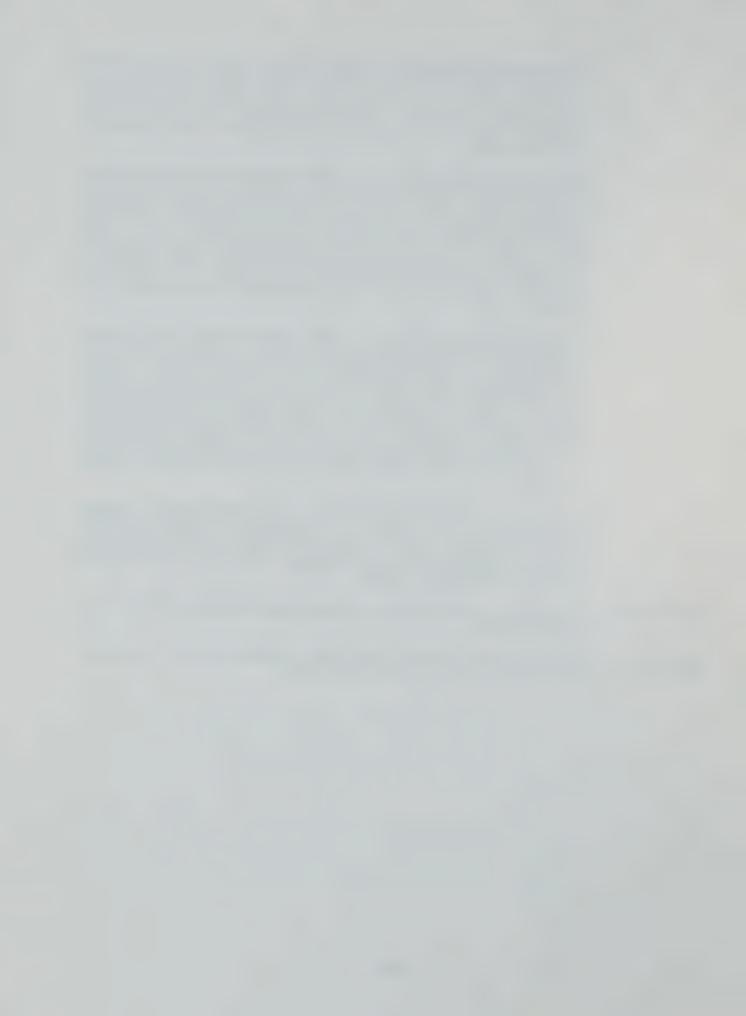
 Use of a semi-confined dredging technique to limit the amount of sediments to be dredged and disposed of. Steel sheeting will extend approximately six inches above the channel bottom, preventing slumping of adjacent sediments into the dredged area. This will shorten the dredging period, and will limit the dredge volume to approximately that which would have been generated in the cofferdam alternative.



- Use of a closing clamshell bucket on the dredge. A closing clamshell bucket similar to that used for the dredging of the Third Harbor Tunnel across the Boston Inner Harbor will help avoid sediment spillage over the top of the bucket and lead to a considerable reduction in the level of suspended solids during dredging operations. Water quality impacts can be further reduced by using care with the rate of bucket lifting.
- Use of silt curtains around the dredge site that extend to the channal bottom during all phases of the tidal cycle. Full depth vented silt curtains extending to the channel bottom will be installed around the dredging operation. Opening and moving of the curtains will be facilitated by raising the curtain bottom with ropes preattached to the ballast chain. Excessive ballooning of the curtains will be controlled by the use of curtain windows of sufficient area to allow passage of water through the curtains during tidal changes. These windows will be located as close to the flotation as possible to prevent the passage of the more turbid lower waters.
- Close and frequent monitoring of water quality at key receptor points. Monitoring of the water quality in the Fort Point Channel will be conducted during the dredging, screeding, and backfilling of the channel crossing project. Turbidity will be continually monitored in the tanks of Neptune Lobster Company and James Hook & Company in the channel mouth area between Fan Pier and the New England Aquarium, and at the Congress Street Bridge; water quality in the Fort Point Channel will be monitored on a weekly basis. Monitoring will be conducted for turbidity, suspended solids, heavy metals, and polynuclear aromatic hydrocarbon (PAH) compounds at discrete intervals of the water column, including the bottom.
- Development of contingency plans for sea water service for nearby consumers. Should the amount of suspended solids in the tanks of the two lobster companies be found to exceed a background of 50 milligrams per liter despite the mitigation efforts, temporary intakes will be extended to points beyond the mouth of the Fort Point Channel.

Comment 98: The applicant is reminded that the proposed project is subject to MCZM Federal Consistency Review.

Response: As noted above in the response to the previous comment, the MBTA is preparing a MCZM Federal Consistency Certification Statement.





February 9, 1994

Ms. Mary Beth Mello, Deputy Regional Administrator Federal Transit Administration - Region I 55 Broadway Cambridge, MA 02142

SUBJECT: Massachusetts Bay Transportation Authority's (MBTA) South Boston Piers/Fort Point Channel Transit Project Response To FEIS/FEIR EOEA # 6826

Dear Ms. Mello:

The Massachusetts Highway Department's comments on the proposed South Boston Piers/Fort Point Channel Transitway Project evolve around the ongoing construction of the Relocated Northern Avenue Bridge and Roadway located across and just east of the Fort Point Channel in South Boston. Conflicts with the tunnel location, Courthouse Station location and construction methodology as it relates to geotechnics are yet to be resolved.

The proposed alignment of the tunnel section under the Fort Point Channel and the Victoria Station restaurant with the battered pile system supporting the easterly abutment of the Relocated Northern Avenue Bridge may be in conflict. The MBTA must recheck their final location of the tunnel so as to not interfere with the location of the battered piles supporting the East Abutment located under the Victoria Station restaurant (MBTA's Station 105±). The Department requires assurances that the proposed tunnel will not negatively affect the integrity of the battered pile system and the East Abutment. If the need arises, the alignment should be moved in a southerly direction to alleviate any conflicts.

The location of the Courthouse Station is in conflict with the 100 roadway circulation scheme as proposed by the City of Boston and as currently designed under the proposed Fort Point Channel Streets project. Current MBTA plans incorrectly show Farnsworth Street intersecting with Relocated Northern Avenue. Although, this scheme was discussed at the preliminary level, engineers at the City of Boston have decided to eliminate this intersection. Without an intersection located at Farnsworth Street, what is the logic in placing headhouses mid-block on the north and south sides of Relocated Northern Avenue at this site (MBTA Station 109±)? headhouses were to be located mid-block, there would be a need to design pedestrian signals, handicap access ramps, cross-walk pavement markings and curb cuts to the median. Interconnected signals would also be appropriate in order to facilitate an even



# Page 2 - Response To FEIS/FEIR EOEA # 6826

flow of traffic throughout the area. Previous experience with free-zones (page 5-10 FEIS) at South Station (red line) have shown that pedestrians will opt for direct surface crossings over the mezzanine proposal.

The Department suggests a return of the proposed alignment which called for the Courthouse Station to be located approximately five hundred feet (500.0') east of the present location, between Pittsburgh Street and the West Service Road. This proposed location will allow for the headhouses to be centrally located to current development, including museums and restaurants, and future development, including the Federal Courthouse and developable parcels. The headhouses will be located at designed intersections, eliminating the need for mid-block signalization. In addition to a more centrally located access point, the alignment could be moved southerly at the east abutment, eliminating potential conflicts with abutment piles and the tunnel, and making for a smoother transition curve to meet with a relocated Courthouse Station.

The Department must know that the Relocated Northern Avenue roadway facility will not be negatively affected by additional subsurface loads brought on by the MBTA's proposed construction. During design of the Relocated Northern Avenue roadway portion, borings were taken to determine sub-surface conditions. These borings revealed the need to utilize surcharge in the proposed construction area to address geotechnical concerns relating to the sub-surface soil conditions and soil settlement in this tidal fill area. The Department is concerned with the addition of sub-surface tunnels, platforms, live-loads and surface headhouses, and the associated settlement associated with these proposed loads under the roadway. These geotechnical issues have not been adequately addressed.

The Department applauds the efforts made to date by the MBTA in documenting the anticipated impacts and benefits of such a complicated project. We hope these additional comments, relating to alignment, station location and geotechnics, will aid the MBTA in their proposal to construct an efficient state of the art transportation system, insuring regional intermodal transportation goals.

Sincerely, Ross B. Dirdio

Ross B. Dindio, P.E.

Chief Engineer

AJM/ajm F:\WP\DOCS\TRANSIT.EIR

101



## **Massachusetts Highway Department**

#### Comment 99:

The proposed alignment of the tunnel section under the Fort Point Channel and the Victoria Station restaurant with the battered pile system supporting the easterly abutment of the Relocated Northern Avenue Bridge may be in conflict. The MBTA must recheck their final location of the tunnel so as to not interfere with the location of the battered piles supporting the East Abutment located under the Victoria Station restaurant (MBTA's Station 105+). The Department requires assurances that the proposed tunnel will not negatively affect the integrity of the battered pile system and the East Abutment. If the need arises, the alignment should be moved in a southerly direction to alleviate any conflicts.

## Response:

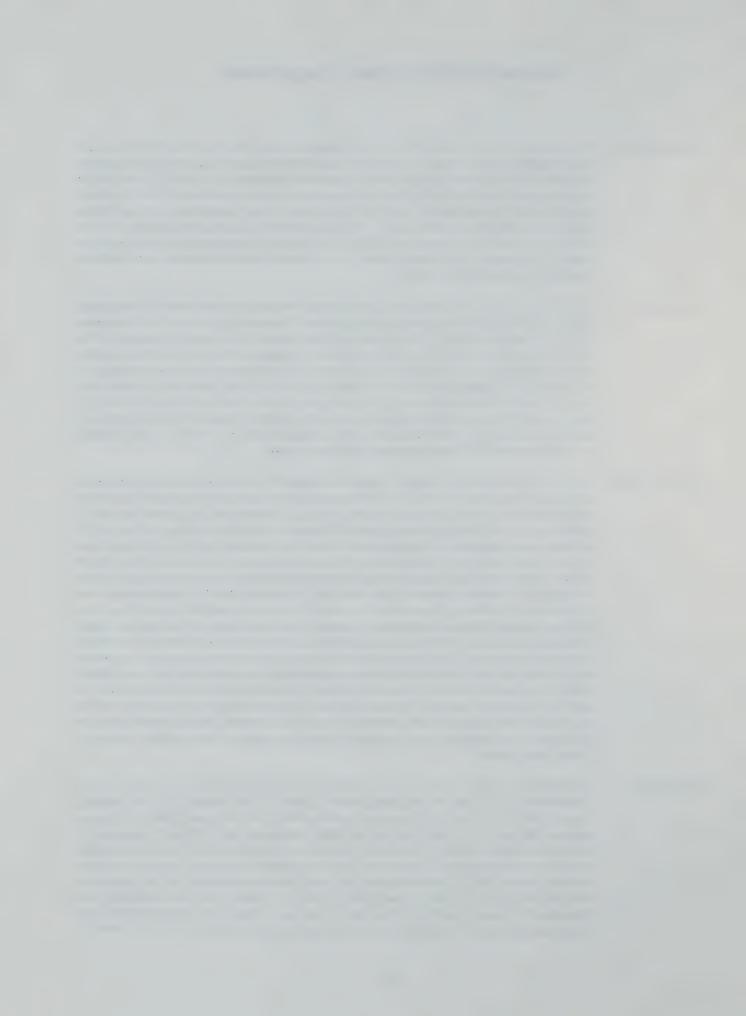
The Transitway will be designed such that the proposed tunnel will not negatively affect the integrity of the battered pile system of the east abutment of the Relocated Northern Avenue Bridge. Temporary and permanent structures proposed for the Transitway can be constructed without adverse impacts to the integrity of the existing battered foundation piles for the east abutment of the New Northern Avenue Bridge. It is proposed to utilize an excavation support system for the Transitway construction that consists of internally braced rigid sheet pile. Instrumentation will be installed and monitored throughout the duration of construction. It is anticipated that soil movements can be controlled within an acceptable range. There are no physical conflicts between the Transitway and bridge structures.

#### Comment 100:

The location of the Courthouse Station is in conflict with the roadway circulation scheme as proposed by the City of Boston and as currently designed under the proposed Fort Point Channel Streets project. Current MBTA plans incorrectly show Farnsworth Street intersecting with Relocated Northern Avenue. Although, this scheme was discussed at the preliminary level, engineers at the City of Boston have decided to eliminate this intersection. Without an intersection located at Farnsworth Street, what is the logic in placing headhouses mid-block on the north and south sides of Relocated Northern Avenue at this site (MBTA Station 109+)? If headhouses were to be located mid-block, there would be need to design pedestrian signals, handicap access ramps, cross-walk pavement markings and curb cuts to the median. Interconnected signals would also be appropriate in order to facilitate an even flow of traffic throughout the area. The Department suggests a return of the proposed alignment which called for the Courthouse Station to be located approximately 500 feet (500.0') east of the present location, between Pittsburgh Street and the West Service Road. In addition to a more centrally-located access point, the alignment could be moved southerly at the east abutment, eliminating potential conflicts with abutment piles and the tunnel, and making for a smoother transition curve to meet with a relocated Courthouse Station.

#### Response:

The MBTA has met with public agencies, including the Boston Transportation Department (BTD), Boston Redevelopment Authority (BRA), Massachusetts Highway Department (MHD), and the General Services Administration, and private interests, such as the McCourt-Broderick Limited Partnership and the Children's Museum, to address concerns about Courthouse Station as documented in comment letters submitted on the project's FEIS/FEIR. Issues discussed with these public and private interests include safety, pedestrian access, and future development in the Piers area. After consideration of the various concerns and competing interests identified and discussed in these meetings, the MBTA has determined that the location of the Courthouse Station, including the headhouses as proposed in the FEIS/FEIR, is



appropriate, and should not be changed. However, other mitigation measures to address concerns expressed during meetings with public and private interests will be implemented. These measures are discussed later in this section, following a brief description of the rationale for the proposed Courthouse Station siting decision.

The two Piers area Transitway stations – Courthouse and World Trade Center Stations – were sited to provide maximum transit coverage of the area. These stations were sited by the MBTA with input from state and city planners, including the BRA and Massport, as well as from Piers area property owners and developers.

Alternative locations for Courthouse Station at Sleeper and Pittsburgh Streets were considered during station siting. Neither of these locations is as advantageous as the proposed Farnsworth Street location. Of primary importance is that the Courthouse Station be as close as possible to the new Federal Courthouse. The proposed Farnsworth Street location is directly opposite (although a block away from) the main entrance of the Courthouse. Although a Courthouse Station shifted west to Sleeper Street would be dramatically sited on the waterfront, engineering for such a shift is not feasible for a number of reasons.

Specifically, the proposed Courthouse Station platforms are located on a tangent (i.e., straight) section. Moving the station west would place the platforms on a curve. Since a tangent section is required for station platforms, the Transitway alignment west of Sleeper Street would need to be redesigned. Such a realignment is not feasible, however, since it would result in an adverse impact to the abutment of the New Northern Avenue Bridge. Alternatively, the current proposed platform location could be maintained, and the headhouses relocated to Sleeper Street. This extension of the accessways to Courthouse Station would result in a much larger and more costly station. Furthermore, the construction of the New Northern Avenue Bridge immediately adjacent to Sleeper Street headhouses would pose safety problems for transit passengers entering or exiting the station. Cars coming off the incline of the New Northern Avenue Bridge will reach grade at the intersection of Sleeper Street and New Northern Avenue. As cars come down the incline, they are likely to be accelerating. Similarly, as motorists approach the bridge incline, their natural instinct would be to accelerate. The safety of Transitway station users and other pedestrians could be jeopardized by the six lanes of accelerating traffic and motorists with poor sight lines at the intersection of Sleeper Street and New Northern Avenue.

A station location at Pittsburgh Street would be located too far from the Federal Courthouse, existing development along the western edge of the Fort Point Channel, and a potential future water shuttle terminal at Fan Pier. It is desirable from both wayfinding and urban design perspectives that the headhouses be as close as possible to, and visible from, the channel and the Fan Pier. Along with the future Federal Courthouse, these are two of the Piers area's strongest geographical features.

The Courthouse Station location at the western edge of the Piers area was chosen specifically to serve existing developments, including Museum Wharf (consisting of the Children's Museum, Computer Museum, and Boston Tea Party Ship Museum) and the Boston Wharf Company. Approximately one-third of existing development in the Piers area is focused there. This development consists primarily of office uses, which generate a high level of trip demand per square foot of development.

A one-quarter mile walk radius was used to analyze station locations with respect to their ability to serve area development. To avoid overlap of these radii and maximize the cost-effectiveness of the project, the two stations were spaced roughly one-half



mile apart. The northwest entrance to Courthouse Station is located across from the new Federal Courthouse at Fan Pier (within a two-minute walk distance), and a southwest entrance provides access to the Boston Wharf Company buildings and to Museum Wharf. Using a one-quarter mile walk distance, Courthouse Station will also serve developments in the easternmost portion of the Financial District, including International Place.

In their comments on the Transitway's Draft Environmental Impact Report, officials from the Computer Museum stressed that the Courthouse Station should remain as close to Museum Wharf as possible. Museum Wharf currently attracts over a million visitors each year, and museum directors believe that convenient, accessible transit is likely to capture a considerable portion of these visitors and Museum staff if the service meets their needs. Needs include a short walk distance from the Transitway station, and easily accessible vehicles that can accommodate strollers, baby carriages, and wheelchairs. Future transportation developments, such as water shuttle services expected to dock at Fan Pier, and the existing Northern Avenue Bridge, which is proposed for conversion as an enhanced pedestrian walkway, would also be well-served by station headhouses in the vicinity of Farnsworth Street.

Based on these factors, the MBTA believes that the Piers area would be ill-served by a relocation of Courthouse Station. While the MBTA recognizes that pedestrian safety is of paramount concern given the midblock location of station headhouses in the vicinity of Farnsworth Street, such headhouse locations have been successful elsewhere in the MBTA system. For example, the Kendall and Kenmore Stations are at mid-block locations. Easy access to these stations is achieved in several ways. At Kenmore Station, headhouses on either side of Commonwealth Avenue lead to a mezzanine, while passengers accessing Kendall Station are eased across the highly defined mid-block crossing by flags set into the median of Main Street in Cambridge and a pedestrian actuated signal.

As described in the FEIS/FEIR, Courthouse Station will be designed with a mezzanine accessible from both sides of New Northern Avenue. Other mitigation measures that the MBTA commits to implement with approval from such agencies as the BTD include the following:

- Courthouse Station entrance/exit at Pittsburgh Street. The headhouse located at the southeastern corner of New Northern Avenue and Pittsburgh Street will be open as a Courthouse Station entrance/exit. Previously, this headhouse was designated as an emergency exit only, with the main station entrance/exit headhouses located on both sides of New Northern Avenue in the vicinity of Farnsworth Street. The designation of all three headhouses for station entrance/exit will improve pedestrian circulation at Courthouse Station, and will now allow pedestrians to access the station at the New Northern Avenue/Pittsburgh Street signalized intersection.
- Installation of a barrier. A fence or other barrier along the New Northern Avenue median would prevent mid-block crossings. The current median plan for New Northern Avenue does not provide for any such barrier. The MBTA will work with other agencies, such as the BRA, on the final landscaping plan for the New Northern Avenue median. In combination with a median barrier, a pedestrian actuated signal could be installed at the midblock headhouse location. A change in the color and material of the crossing could also be provided to alert motorists that this is a pedestrian crossing. At a minimum, the crosswalk striping here should be very wide so motorists have a strong visual cue that crossings may occur.



• Clear signage and graphics. Provision of clear signage and graphics both at the station level underground and at the street level will greatly facilitate communication with pedestrians. Prominent below level signage will direct exiting passengers to the appropriate side of New Northern Avenue so they can reach their destinations without crossing the street at the surface. Headhouses at street level will be marked by a strong and highly visible design. It is also the intention of the MBTA to have a community relations person in the station to answer questions and direct station users to destinations in the Piers area.

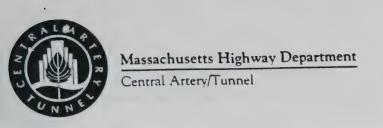
#### Comment 101:

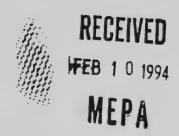
The Department must know that the Relocated Northern Avenue roadway facility will not be negatively affected by additional sub-surface loads brought on by the MBTA's proposed construction. During design of the Relocated [New] Northern Avenue roadway portion, borings were taken to determine sub-surface conditions. These borings revealed the need to utilize surcharge in the proposed construction area to address geotechnical concerns relating to the sub-surface soil conditions and soil settlement in this tidal fill area. The Department is concerned with the addition of the sub-surface tunnels, platforms, live-loads and surface headhouses, and the associated settlement associated with these proposed loads under the roadway. These geotechnical issues have not been adequately addressed.

## Response:

The MBTA has recently conducted a geotechnical exploration program that included nine geotechnical borings within the New Northern Avenue alignment, ranging from 100 to 160 feet in depth. A geotechnical report will be issued upon completion of laboratory testing and analysis of the results. The report will contain recommendations for permanent foundations and criteria for support of excavation during construction. In general, the Transitway tunnel structure will not impose any additional subsurface loads in the area of New Northern Avenue, since the weight of the tunnel is less than the weight of the volume of soil it will replace. It may be necessary to use deep foundations or ground anchors to resist hydrostatic uplift on the tunnel in some areas.







February 9, 1994

Ms. Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street - Room 2000
Boston, MA 02201
Attention: MEPA Unit

Subject: EOEA #6826

Massachusetts Bay Transportation Authority

South Boston Piers/Fort Point Channel Transit Project

Boston, Massachusetts

Final Environmental Impact Statement/Report

Dear Secretary Coxe:

Please find attached Central Artery/Tunnel Project ("CA/T Project") comments on the Massachusetts Bay Transportation Authority's (the "MBTA") Final Environmental Impact Statement/Report ("FEIS/R") for the South Boston Piers/Fort Point Channel Transit Project (the "Transit Project"), Boston, Massachusetts. Notice of the availability of the FEIS/R was published in the Environmental Monitor on December 22, 1993.

The CA/T Project endorses the Transit Project's goal to enhance future economic expansion in the South Boston area and recognizes the critical link between mass transit and economic development. We have worked closely with the MBTA to explore the possibilities of combining construction activities. The timing of the Transit Project, coincident with CA/T Project construction now moving forward, affords the Commonwealth a unique opportunity to realize benefits of joint construction. Excavating once, rather than twice, along Atlantic Avenue will result in reduced traffic, air quality, and noise impacts to businesses, residential communities, and visitors to the City.

The CA/T Project does not recommend further environmental review, but rather, through the enclosed Attachment, provides clarification regarding certain construction activities that are proposed for joint construction with the CA/T Project.



Secretary Coxe 094-416 Page Two

The CA/T Project, as a partner in the regional intermodal transportation system, supports the MBTA's Transit Project, which will enhance the efficiency of public access to the South Boston area and mitigate potential traffic congestion due to future development in the Piers area. We commit to continued close coordination with the MBTA on this important project.

If you have any questions, please contact Ronald S. Killian, CA/T Project Manager of Environmental Procedures and Permits, at (617) 951-6467.

Sincerely,

MASSACHUSETTS HIGHWAY DEPARTMENT

Project Director

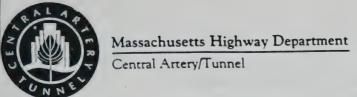
PMZ/RSK/nmm

094-416 AL-1.2

cc: R. Killian, CA/T Project

N. Polcari, MBTA





Ms. Trudy Coxe, Secretary 094-416

## ATTACHMENT

CENTRAL ARTERY/TUNNEL ROJECT COMMENTS ON THE MASSACHUSETTS BAY TRANSPORTATION AUTHORITY'S FINAL ENVIRONMENTAL IMPACT STATEMENT/REPORT FOR THE SOUTH BOSTON PIERS/FORT POINT CHANNEL TRANSIT PROJECT

Russia Wharf, Executive Summary, Section ES.1.3, Page ES-5, Major Changes From the DEIS/SDEIR

- While the CA/T Project alignment and appurtenant structures, approved by MEPA through the Secretary's Certificate #4325 dated January 2, 1991, and the FHWA's Record of Decision dated May 10, 1991, may have restricted the possible alignment options of the Transitway, the change in the Transitway alignment between the MBTA's DEIS/SDEIR and the FEIS/R was not due to refinements made to the CA/T Project, as indicated on page ES-5. The CA/T Project understands that the change in the Transitway alignment by the MBTA was due to further study and development of the Transitway design, which revealed operational constraints.
- Russia Wharf, Section 5.11.3, Page 5-73 Historic Resources

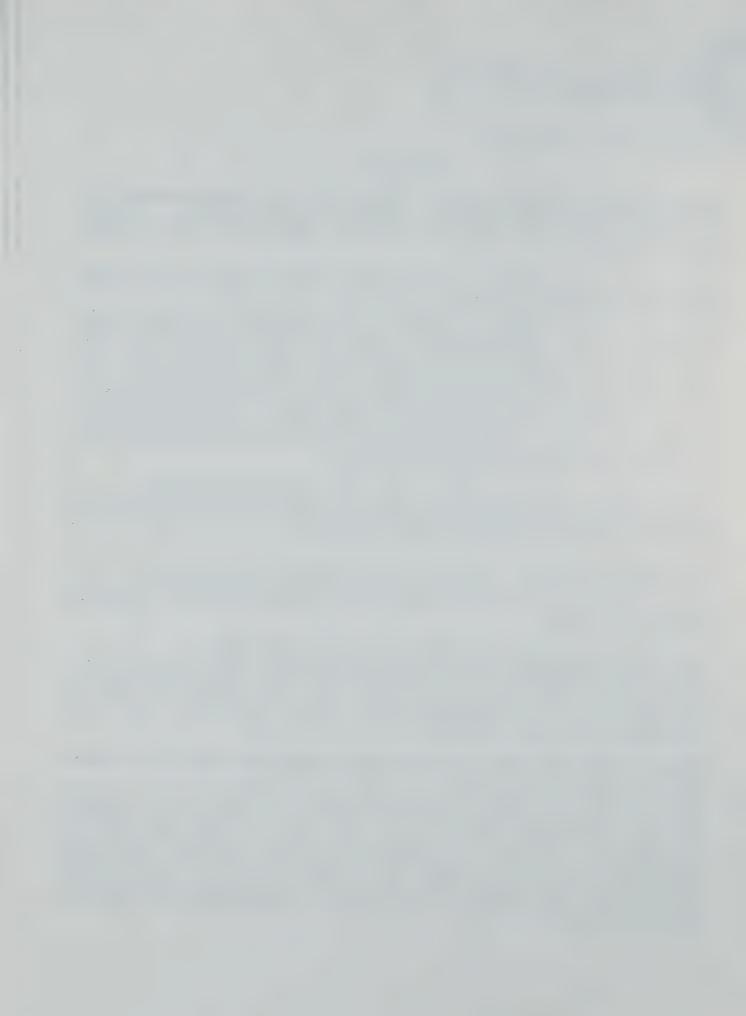
  103 We note that the MBTA will be underpinning Russia Wharf, and any needed protection of Russia Wharf as a result of the underpinning will be the responsibility of the MBTA.
- Mitigation Measures, Section 5.13.5, Pages 5-79 and 5-80

  104 Specific mitigation for joint construction areas will be developed to be consistent with Central Artery/Tunnel Project approved mitigation plans.
- South Station access, Section 5.13.11.1, Page 5-84

  The current MHD/MBTA joint plan indicates that access/egress to the Red Line will always be maintained via the South Station Headhouse. The CA/T Project understands that this access/egress will be provided via the entrance within South Station, the kiosk immediately adjacent to South Station, or both.

McCourt Property, Pages 2-84 and Design Drawings Appendix, Figures A-1, 11 and 12 of 14, and A-2, 9 and 10 of 12

We note that the Transitway alignment necessitates use of a portion of the McCourt property in South Boston. A construction easement on this property was acquired by the Massachusetts Highway Department (the "MHD") for the CA/T Project. Specifically, the property is needed in connection with the Project's materials processing operation program, and is expected to be in use during Transitway construction. Therefore, a continued close coordination by the MBTA and MHD will be required to accommodate the needs of both projects.



# Massachusetts Highway Department Central Artery/Tunnel Project

#### Comment 102:

While the CA/T Project alignment and appurtenant structures, approved by MEPA through the Secretary's Certificate No. 4325 dated January 2, 1991, and the FHWA's Record of Decision dated May 10, 1991, may have restricted the possible alignment options of the Transitway, the change in the Transitway alignment between the MBTA's DEIS/SDEIR and the FEIS/R was not due to refinements made to the CA/T Project, as indicated on page ES-5. The CA/T Project understands that the change in the Transitway alignment by the MBTA was due to further study and development of the Transitway design, which revealed operational constraints.

#### Response:

The MBTA agrees that the CA/T Project alignment and appurtenant structures restricted possible alignment options of the Transitway. The MBTA also agrees that the Transitway was not precluded by these restrictions; however, the resulting alignment posed less than optimal operating conditions in the Transitway tunnel. Although joint construction of the Transitway with the Central Artery north of Congress Street was desirable in terms of its environmental and cost benefits, overriding concern for safe operation of the transit service resulted in the MBTA's decision to change its Transitway alignment. This change was mutually agreed upon by the MBTA and the CA/T Project, which is sharing in the cost associated with the new alignment.

#### Comment 103:

We note that the MBTA will be underpinning Russia Wharf, and any needed protection of Russia Wharf as a result of the underpinning will be the responsibility of the MBTA.

#### Response:

Underpinning of Russia Wharf, which is necessitated by the change in the Transitway alignment described in the response to the previous comment, is the responsibility of the MBTA. The MBTA will provide the necessary protection of Russia Wharf as a result of underpinning. The CA/T Project will mitigate impacts to Russia Wharf associated with construction of its slurry wall.

#### Comment 104:

Specific mitigation for joint construction areas will be developed to be consistent with Central Artery/Tunnel Project approved mitigation plans.

## Response:

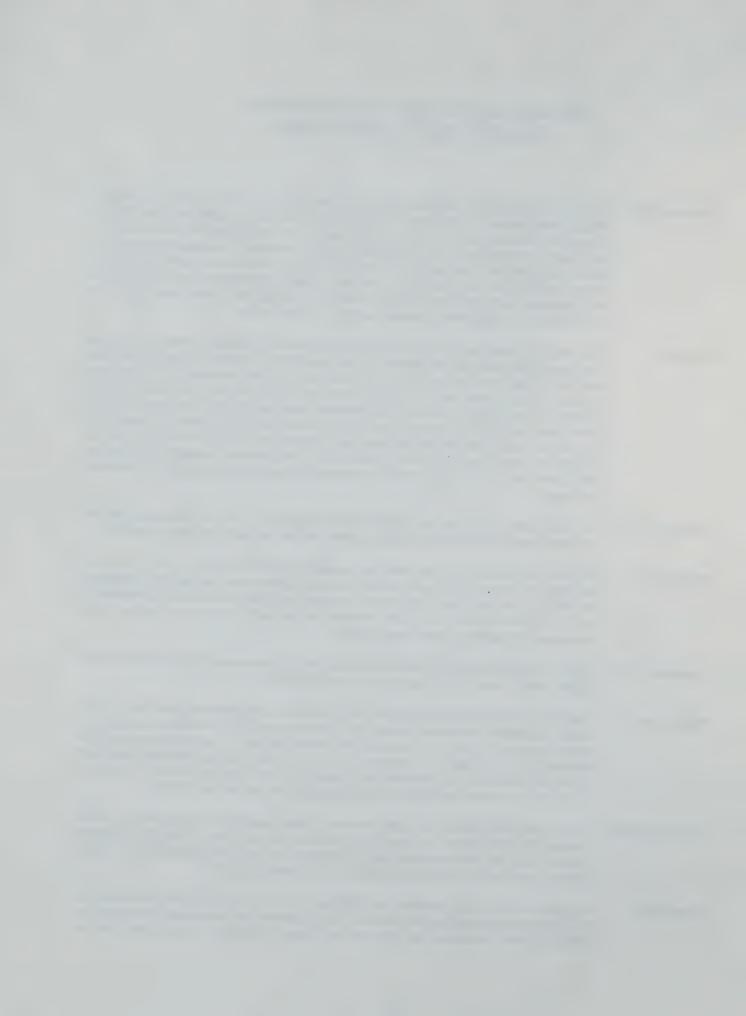
The MBTA has coordinated with the CA/T Project on mitigation for joint construction segments, and all mitigation plans for these sections will be consistent with the CA/T Project's approved plans. For example, the mitigation plan for the C11A1 construction contract, which includes the Transitway station at South Station, turnaround loop, and tunnel box under Atlantic Avenue from Essex Street to 200 feet south of Congress Street, has been developed by the CA/T Project with input from the MBTA.

## Comment 105:

The current MHD/MBTA joint plan indicates that access/egress to the Red Line will always be maintained via the South Station Headhouse. The CA/T Project understands that this access/egress will be provided via the entrance within South Station, the kiosk immediately adjacent to South Station, or both.

## Response:

As noted above in the response to Comment 104, the MBTA will adhere to all CA/T Project approved mitigation plans for joint construction segments, including the provision that access/egress to the Red Line will always be maintained via the



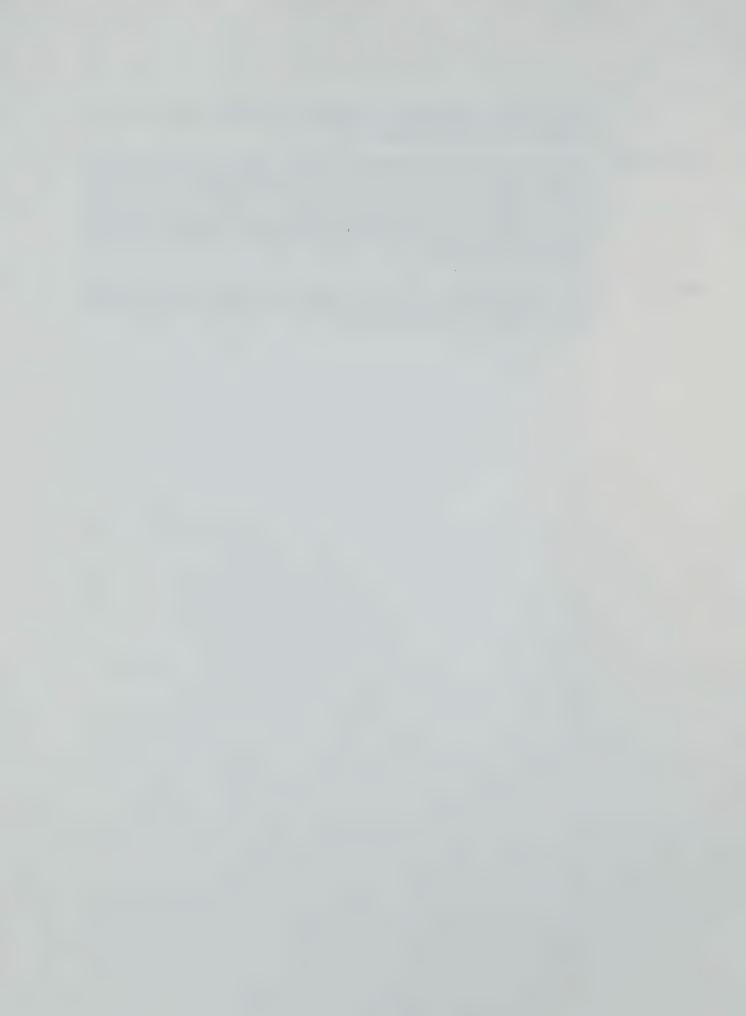
entrance within South Station, the kiosk (whether existing, temporary, or final) immediately adjacent to South Station, or both.

## Comment 106:

We note that the Transitway alignment necessitates use of a portion of the McCourt property in South Boston. A construction easement on this property was acquired by the Massachusetts Highway Department (the "MHD") for the CA/T Project. Specifically, the property is needed in connection with the Project's materials processing operation program, and is expected to be in full use during Transitway construction. Therefore, continued close coordination by the MBTA will be required to accommodate the needs of both projects.

## Response:

The MBTA will work closely with the CA/T Project to coordinate use of a small portion of the materials processing operation site, located on the McCourt property in South Boston, during construction of the Transitway.





RECEIVED FEB 1 4 1994 MEPA

February 8, 1994

Secretary Trudy Coxe Executive Office of Environmental Affairs 100 Cambridge Street, 20th Floor Boston, MA 02202

ATTN: MEPA Unit

107

RE: South Boston Piers/Fort Point Channel Transit Project, Boston,

MA: EOEA No. 6826

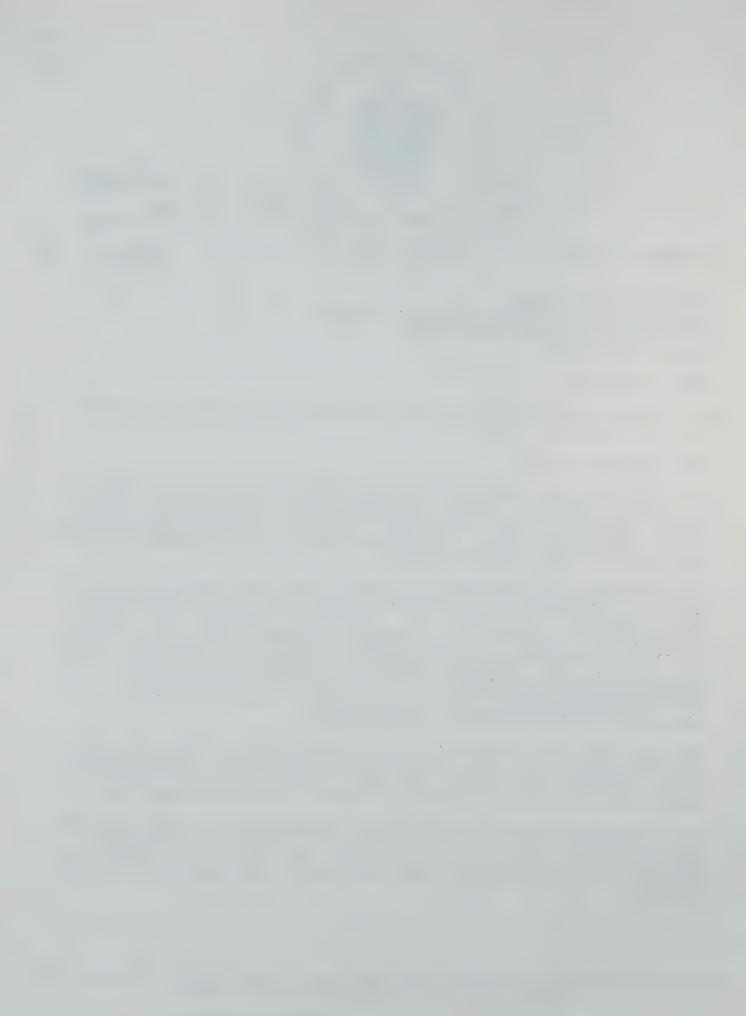
Dear Secretary Coxe:

Staff of the Massachusetts Historical Commission have reviewed the Final Environmental Impact Statement/Final Environmental Impact Report (FEIS/FEIR) submitted to this office, regarding the proposed project referenced above. After a review of this information, MHC staff have the following comments.

The FEIS/FEIR is responsive to MHC's previous comments on the project. A Memorandum of Agreement between the U.S. Federal Transit Administration, the MHC, the Advisory Council on Historic Preservation, the MBTA, and the Boston Landmarks Commission (a copy of which is included in the FEIS/FEIR) outlines stipulations which will ensure that adverse effects to significant historic and archaeological resources are avoided, minimized, or mitigated. MHC staff understand that the MOA is currently being reviewed by the Advisory Council on Historic Preservation.

MHC has not yet received the two copies of the final (revised) archaeological report described on pages DEIR-99 to 100 and DEIS-45 of the "Response to Comments Appendix" of the FEIS/FEIR. The report should be submitted to the MHC for review as soon as possible.

These comments are provided to assist in compliance with Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800), Massachusetts General Laws, Chapter 9, Sec. 26-27c, as amended by Chapter 254 of the Acts of 1988 (950 CMR 71.00), and MEPA (301 CMR 11.00).



If you have additional questions, please contact Edward Bell or Allen Johnson of this office.

Sincerely,

Judith B. M. Danough

Judith B. McDonough Brecutive Director State Historic Preservation Officer Massachusetts Historical Commission

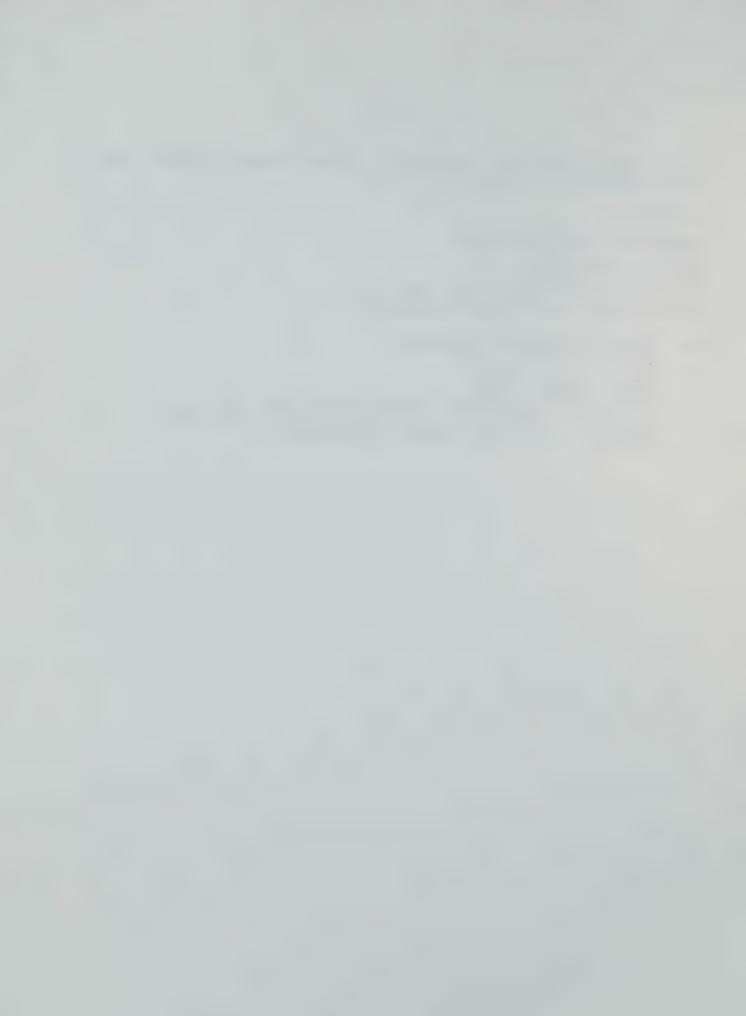
cc: Boston Landmarks Commission

Mary Beth Mello, FTA Mary Ainsley, MBTA Nancy Polcari, MBTA

Pauline Chase-Harrell, Boston Affiliates, Inc.

Deborah C. Cox, Public Archaeology Laboratory, Inc.

Advisory Council on Historic Preservation



## **Massachusetts Historical Commission**

Comment 107:

MHC has not yet received the two copies of the final (revised) archaeological report described on pages DEIR-99 to 100 and DEIS-45 of the "Response to Comments Appendix" of the FEIS/FEIR. The report should be submitted to the MHC for review as soon as possible.

Response:

Two copies of the Archaeological Reconnaissance Survey for the South Boston Piers Transitway Project were submitted to the Massachusetts Historical Commission (MHC) on April 4, 1994. As requested by MHC in its comments on the project's DEIR and DEIS/SDEIR, this report incorporates the results of the Phase Ia and Supplemental Phase Ia Archaeological Reconnaissance Surveys conducted for the Transitway Project. The report was prepared in accordance with the technical and format requirements of the MHC.





31 January 1994

Ms. Mary Beth Mello
Deputy Regional Administrator
United States Department of Transportation
Federal Transit Administration
55 Broadway
Cambridge, Massachusetts 02142

Re: South Boston Piers/Fort Point Channel Transit Project

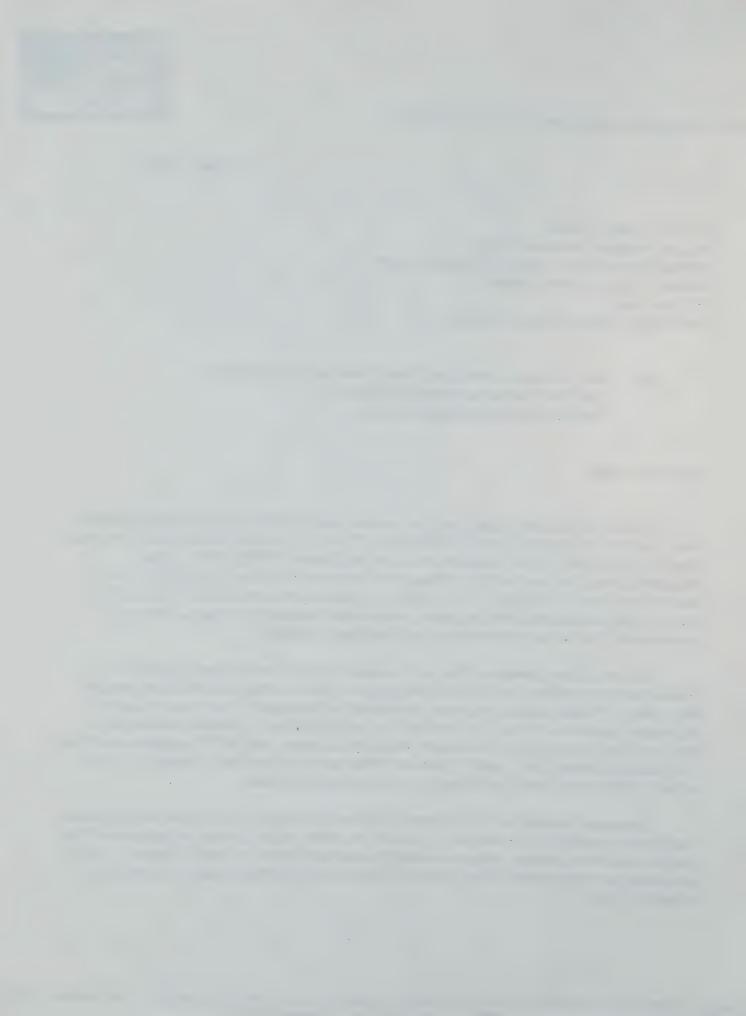
Final Environmental Impact Statement Final Environmental Impact Report

Dear Ms. Mello:

Thank you for the opportunity to review and comment on the South Boston Piers/Fort Point Channel Transit Project (the "Transit Project"), Final Environmental Impact Statement / Final Environmental Impact Report ("FEIS/FEIR"). The Massachusetts Port Authority's (Massport) overall evaluation of the FEIS/FEIR is one of enthusiastic support. The Authority believes that the MBTA'S FEIS/FEIR appropriately evaluates the proposed project environmental impacts, and we recommend that a favorable Record of Decision be issued.

As you know, Massport has long supported the Transitway project as a critical tool for realizing economic development, environmental and urban design objectives. These goals have been developed by Massport, the Massachusetts Highway Department, the City, the MBTA, and Community representatives over the past five to ten years. Massport strongly supports the MBTA's selection of the Full Build option as the Locally Preferred Alternative, since this is the only option which is fully consistent with the 2010 development goals.

Massport's outstanding concerns involve a number of economic development and design issues, the resolution of which we view as critical to the success of the long-range urban design and economic development plans in South Boston. These concerns are addressed in the attached comments, but four issues warrant your attention here.



Ms. Mary Beth Mello, Federal Transit Administration page 2

The FEIS/FEIR correctly states that there are at least two significant unresolved issues: the disposition of the New England Seafood Center and the siting of the Transitway storage and maintenance facility. We think that the correct resolution of the first issue includes a taking of the Seafood Center by the MBTA. Such a taking, we believe, will facilitate the Transitway's construction and, thus, will ultimately provide significant construction cost savings. In addition, the taking will permit the timely development of New Congress Street by others in the street's permanent location. You should be aware that New Congress Street's proper alignment fundamentally organizes the new district's vehicle circulation pattern and serves as a lifeline, relating the district back to downtown Boston.

The MBTA's prefers the Summer Street site for the Transitway's storage and maintenance facility. A significant portion of this site is currently in use in a water dependent activity. For this reason, the Authority strongly feels that the First Street site may be preferable. However, neither site may be appropriate. The MBTA's Schematic Design Report suggests that even at the First Street site, existing structures may have to be affected. One idea to bear in mind is that the maintenance facility's configuration on an appropriate site should be designed so as to minimize disruption to existing or future operations. With recent reorganizations at both the state and city level, there may be siting opportunities which were not explored in earlier analyses. The Authority is prepared to work closely with MBTA staff to resolve this issue.

There are two additional overarching issues which remain unresolved: the Transitway's transition at D Street and the Massport-MBTA coordination on the Transitway's development. Because Massport believes that it is important not to preclude the possibility for future development opportunities east of D Street, we would like to coordinate with Transitway project staff to allow for a minimum-cost and minimum disruption solution for a future sub-surface extension to this area. With respect to Massport-MBTA development coordination, the Transitway will have to be integrated with future Massport air rights developments, potentially requiring shared structures. The right of way issues will require the creation of easements; the close physical proximity of these projects will require rigorous coordination. An interagency memorandum of understanding is likely to be required to structure all these considerations.

The decisions to be made regarding these unresolved issues will require active Massport involvement, and must be responsive to relevant waterways regulations as well as the mutually agreed upon South Boston infrastructure, economic development and urban design plans.

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Ms. Mary Beth Mello, Federal Transit Administration page 3

In conclusion, on behalf of the Port Authority let me reiterate our whole-hearted support for the South Boston Piers/Fort Point Channel Transit Project. I extend the Authority's gratitude for the opportunity to review and comment on the outstanding work presented in the FEIS/FEIR. I and my staff remain prepared to assist you in resolving any questions you may have regarding the concerns raised in this letter. The Authority looks forward to working closely and cooperatively with the MBTA to resolve these and other strategic challenges as the Transit Project progresses.

Sincerely,

Stephen P. Tocco Executive Director

Attachment SPT/BR/br

cc: John J. Haley, Jr., MBTA General Manager
Nancy T. Polcari, MBTA Assistant Director of Design & Construction
Mary Ainsely, MBTA Project Manager

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## Attachment

Massport Review Letter, 31 January 1994, regarding Massachusetts Bay Transportation Authority South Boston Piers/Fort Point Channel Transit Project Final Environmental Impact Statement/Final Environmental Impact Report

1. page ES-4

111

- The 2010 'high growth' land use scenario on Massport controlled properties should be regarded as a lower bound.
- 2. Figure ES-2
- A Point of clarification: the graphic showing the proposed MBTA maintenance facility site at Summer Street/Pappas Way is a bit ambiguous. The facility is better shown in an earlier document: Schematic Design Report, November 1992. Figure MF-1 in that report, Alternative A, shows the proposed site. The proposed site occupies part of the Subaru site (water dependent use) and part of the Pappas site. Massport uses this siting in our assessment of the project.
  - 3. page ES-10
- The locally preferred alternative is the Full Build option; the trackless trolley operation in a two-phase (MOS-2 then FULL BUILD) tunnel design. The MBTA's trackless trolley proposal will be powered via overhead catenary; some of these catenaries will be on MPA streets. MPA insists that the MBTA mitigate negative impact with appropriate design. Thus, interagency coordination on design will be a high priority. Massport wishes to retain design review and approval of the catenary system at least on MPA streets.
  - 4. page ES-11

The Full Build alternative is the only design option which can fully support the mutually agreed upon 2010 South Boston Piers development goals. Massport fully supports the selection of the Full Build alternative.

- 5. page ES-19
- In the 2010 MOS scenario, the only surface street intersection which fails is Massport Haul Rd/D Street; this intersection is owned by Massport. This intersection operates at LOS E -- not a failure, but below the Central Artery/Tunnel (CA/T) standard of LOS D. The operation of this intersection needs mitigation; Massport will insist that the CA/T project and the MBTA mitigate this issue appropriately.

This intersection improves to LOS D in the Full Build scenario. Thus, the sooner the Full Build alternative is completed, the better Massport streets operate.



## 6. ES-24

The MBTA correctly states that the Subaru site on Summer Street/Pappas Way is a water dependent use, and that the MBTA would mitigate negative effect by providing relocation assistance.

Massport wishes to point out that taking a water dependent site for a nonwater dependent use is contrary to CZM objectives, irrespective of relocation assistance.

page 5-48

- The Transitway FEIR/FEIS argues that the Maintenance Facility is a non-water dependent use. One standard that non-water dependent uses are supposed to meet is "the protection of maritime commerce, industry, recreation and associated public access." The maintenance facility at Subaru is clearly antithetical to achieving this goal. This argues for siting the maintenance facility on the First Street site.
  - 7. page ES-27

Traffic mitigation during construction. The MBTA plans to handle this on a section design consultant basis. This is a beginning; it is not the whole answer.

- Traffic mitigation must be coordinated with the CA/T project and World Trade Center (WTC) construction. The entire South Boston area, north of First Street, must be explicitly considered in developing a comprehensive traffic mitigation plan. Massport wishes to retain review and approval regarding the traffic mitigation plan.
  - 8. Page ES-34

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118

Two overarching policy decisions remain to be made by the Transitway project:

- The New England Seafood Center -- taking or underpinning. From
  Massport's perspective, taking is the preferred option. This option will
  permit easier, more timely, and ultimately more economical construction. It
  will also permit the placement of New Congress Street in its preferred
  alignment, linking the WTC development to the downtown.
  - The Transitway storage and maintenance facility site. The Transitway FEIR/FEIS proposes two sites: one, along First Street along the southern portion of the Pappas parcel; the project's preferred site is comprised of part of the Subaru parcel and the northern part of the Pappas parcel. The Subaru parcel is a water dependent use. Thus, the Summer Street site is the more environmentally defensible site.

## 9. page 2-58

The FEIR states that there will be at-grade pedestrian entrances to the WTC station from C and New Congress Streets.

There is no entrance from C Street. There may be an emergency station exit to C Street.



- 10. page 2-79
  Locally Preferred Altenative: The MBTA's preferred alternative is the Full Build alternative. It will operate with trackless trolley vehicles. The alternative will be staged. The initial phase is MOS-2, from South Station to WTC station, to be operational by year 2000. The second phase, extension from South Station to Boylston, to be operation by 2008. Massport fully supports this incremental development approach. The sooner the Full Build option is realized, the more improved surface street operations will be on Massport streets.
- 121 11. The MBTA's proposes to portal from tunnel to surface trackless trolley operations at D Street. This portal is on a Massport-controlled street. The Authority requires a traffic operations analysis of this proposed design. The analysis will address all D Street intersection operations from Summer Street to Northern Avenue. The analysis years will be 2000 (or opening year) and 2010 (design year).



## **Massachusetts Port Authority**

#### Comment 108:

We think that the correct resolution... includes a taking of the Seafood Center by the MBTA. Such a taking, we believe, will facilitate the Transitway's construction and, thus, will ultimately provide significant construction cost savings. In addition, the taking will permit the timely development of New Congress Street by others in the street's permanent location. You should be aware that New Congress Street's proper alignment fundamentally organizes the new district's vehicle circulation pattern and serves as a lifeline, relating the district back to downtown Boston.

### Response:

The New England Seafood Center is located on a 4.4-acre parcel at 145 Northern Avenue and is bordered by the East Service Road on the west, B Street on the east, and Congress Street (and the proposed New Congress Street) on the south. The land and building are owned by eight partners of the Massachusetts partnership known as the New England Seafood Center Associates.

The Center consists of a brick and concrete structure containing fish processing and wholesale distribution companies, as well as a nightclub in the northernmost portion of the building. The building contains approximately 85,600 square feet and was built in two sections. The section that fronts on Northern Avenue was constructed in 1954, and the rear portion was constructed in 1970.

The building has loading docks on the east, west, and south sides. Truck access is maintained around the entire building. The non-fish tenant, the nightclub known as "Polly-Estas," also has a loading dock where beverages are handled. All loading docks required for fish processing require refrigeration. The portion of the lot that is not utilized by either the building, access ways, or loading docks is occupied by parking spaces used by employees and occasional visitors. In the evening, the lot is also used by patrons of the nightclub.

Two options have been considered relative to the construction of the Transitway Project through the New England Seafood Center property. These include acquiring the Seafood Center and subsequently demolishing it during construction, or structurally underpinning the building and constructing the Transitway tunnel beneath it. Although the building does not lie within the South Boston Designated Port Area (DPA), it does lie within Chapter 91 jurisdictional boundaries. Acquisition and demolition of the building would therefore require the relocation of all tenants. Additionally, building demolition would result in an expansion of the anticipated area of construction-related disruption and an increase in the project-related volume of demolition wastes. Underpinning would not require the relocation of tenants and would avoid the associated impacts of building demolition.

Upon completion of the project's FEIS/FEIR, the MBTA further investigated the two options for the New England Seafood Center, working closely with agencies such as the Massachusetts Port Authority (Massport), Massachusetts Highway Department (MHD) and the CA/T Project, Boston Transportation Department (BTD), Boston Redevelopment Authority (BRA), and Economic Development and Industrial Corporation (EDIC), as well as with the Seafood Center owners and occupants. Issues regarding future land uses, roadway improvements, construction schedules, and costs were discussed and evaluated. Since this coordination effort did not result in an acquisition plan that was acceptable to all parties, the MBTA proposes to underpin, rather than acquire, the New England Seafood Center. Underpinning, which



will not require the relocation of Seafood Center tenants, is technically feasible and is less expensive than an acquisition.

The MBTA recognizes that construction of the Transitway tunnel through the New England Seafood Center property will require coordination with a number of parties, including area property owners, adjacent businesses, and nearby construction projects. A conceptual design for the proposed underpinning of the Seafood Center consists of jacking pipepiles under the existing foundation and constructing steel framing for support of the building. This method requires jacking and receiving pits on the east and west sides of the building, which must be accessible to the surface. All other work will occur underground and will have little or no effect on the structure during and upon completion of construction. During construction, access to the jacking and receiving pits will require close coordination with the Seafood Center tenants to ensure adequate loading dock space, access around the site, maintenance of power for refrigeration, and parking. Any potential disruption of operations during MBTA construction will require mitigation by the MBTA. The MBTA will work with tenants of the Seafood Center, the CAT Project, and other adjacent projects as the underpinning scheme is designed to further identify impacts and mitigation. Maintenance of traffic plans during underpinning of the Seafood Center by the MBTA will consider such mitigation measures as accommodation of Center truck traffic in adjacent streets, construction during nighttime hours, off-site parking, and loading area reconfiguration. These maintenance of traffic plans will be coordinated with any plans approved for the CA/T Project.

#### Comment 109:

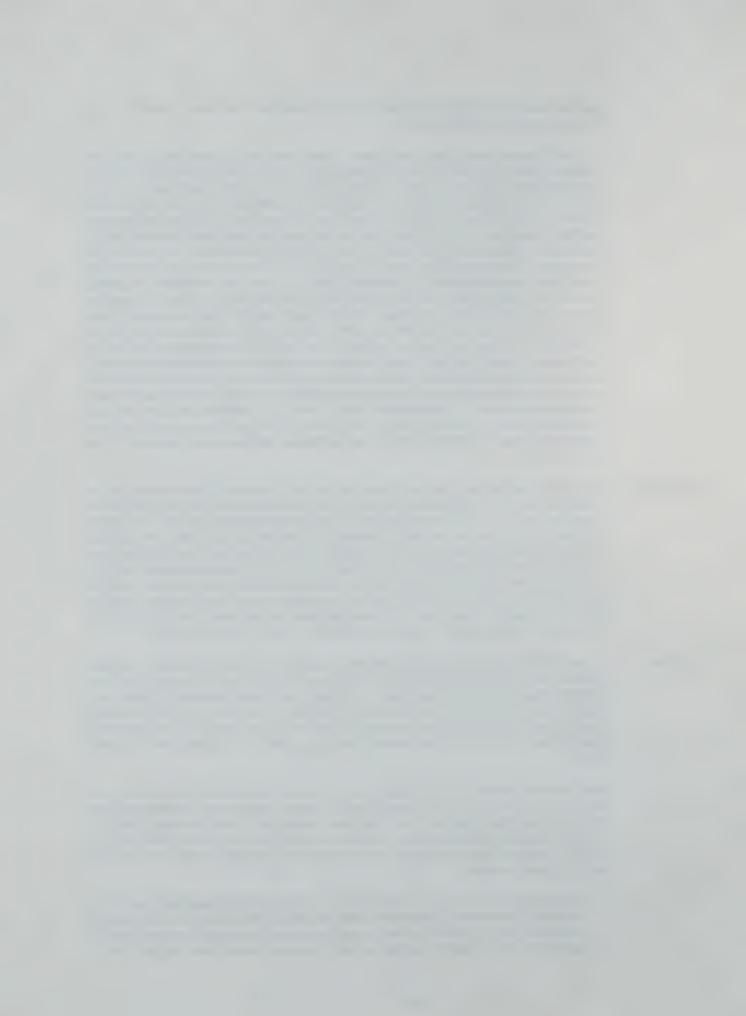
The MBTA prefers the Summer Street site for the Transitway's storage and maintenance facility. A significant portion of this site is currently in use in a water-dependent activity. For this reason, the Authority strongly feels that the First Street site may be preferable. However, neither site may be appropriate. The MBTA's Schematic Design Report suggests that even at the First Street site, existing structures may have to be affected. One idea to bear in mind is that the maintenance facility's configuration on an appropriate site should be designed so as to minimize disruption to existing or future operations. With recent reorganizations at both the state and city level, there may be siting opportunities which were not explored in earlier analyses. The Authority is prepared to work closely with MBTA staff to resolve this issue.

#### Response:

In the FEIS/FEIR, the MBTA analyzed two potential sites for the Transitway Project's maintenance and storage facility. Site A is located at the corner of Summer Street and Pappas Way, while Site B is located on West First Street between E Street and Pappas Way; both sites are located within Chapter 91 jurisdiction. These two sites were screened from a larger number of potential sites, and both were deemed appropriate for location of a maintenance and storage facility to support the Transitway Project.

After several meetings with Massport and Pappas Management Corporation, the owners or representatives of the owners of the two sites under consideration, the MBTA has selected Site B on West First Street for location of the Transitway Project's maintenance and storage facility. The site is preferable over Site A given that no impact to existing water-dependent uses would result. Site B also meets several other important design criteria:

Selection of this site will not displace any existing water-dependent use. This
criterion is particularly important, since the economic vitality of South Boston
depends in large part on the area's water-dependent businesses and industries. A
portion of Site A located at the corner of Summer Street and Pappas Way is



currently used for Subaru overflow vehicle parking; since these vehicles are transported by water, this overflow parking lot is determined to be a water-dependent use. Although Site B is also within Chapter 91 jurisdiction, it does not contain any existing water-dependent uses. It is, therefore, a more desirable location for the Transitway's maintenance facility. Tenants of the site, which is predominantly owned by Massport and partially owned by Atlantic, Inc., include Fortress Records, Corporate Printing Company, Shaughnessy Warehouse, Roadway Trucking, PPG Industries, Yankee Bus, Emerson College, NYNEX, U.S. Postal Service parking, Boston Harbor Industrial Development Corporation, and E Street Associates.

- The site is roughly one-half mile from the Transitway portal, and is located along a future Transitway route to residential South Boston as part of the full build configuration. This location thus minimizes non-revenue producing trips (i.e., "deadheading") for transit vehicles beginning or ending their service routes. It also reduces the need to install additional catenary (overhead wires that provide electrical power to the trackless trolley vehicles) as part of the full build Transitway to extend surface service into residential South Boston; catenary will simply be extended from the West First Street facility. The ability to utilize the same catenary for non-revenue trips to the maintenance facility and revenue trips into residential South Boston as part of the full build Transitway will reduce both one-time construction and ongoing operating and maintenance costs. In addition, combined use of the catenary will limit potential adverse environmental impacts, including visual and aesthetic impacts of the overhead catenary and support structures. This is an important issue as the Piers area streetscape evolves.
- The surrounding area is compatible with activities associated with the Transitway's maintenance and storage facility. The site is adjacent to other light industrial development, and the area in which it is located is expected to remain in such use for the long term. No residential or commercial areas will be affected.
- The site is physically suited to development as a maintenance and storage facility.
   There are a few structures on the site that would need to be removed. Utility service is adequate, eliminating the need for costly infrastructure work. The parcel is regularly shaped, enabling efficient use of the parcel for construction and operation of the facility.
- No hazardous waste spills or releases were identified at this site, based upon review of files of the U.S. Environmental Protection Agency and the Massachusetts Department of Environmental Protection.

#### Comment 110:

Because Massport believes that it is important not to preclude the possibility for future development opportunities east of D Street, we would like to coordinate with Transit-way project staff to allow for a minimum-cost and minimum disruption solution for a future sub-surface extension to this area. With respect to Massport-MBTA development coordination, the Transitway will have to be integrated with future Massport air rights developments, potentially requiring shared structures. The right of way issues will require the creation of easements; the close physical proximity of these projects will require rigorous coordination. An interagency memorandum of understanding is likely to be required to structure all these considerations.

#### Response:

As Massport is aware, the current tunnel alignment of the Transitway portals to surface on the western side of D Street at the location of Massport's replacement parking garage. The MBTA's analysis of development plans for the easternmost portion of the Piers area have shown that this development can be well served by a less costly



surface alignment of the Transitway. However, in order not to preclude the option, the MBTA agrees to discuss with Massport and its developers a possible future extension of the subsurface Transitway east of D Street. Accordingly, any development on the east side of D Street should maintain the option for a possible future Transitway extension. To maintain this option, coordination should occur between the MBTA and Massport and other developers in the easternmost Piers area. It should be noted that there are currently no plans or funding for this extension in the Transitway's environmental documents which have utilized a planning horizon year of 2010.

#### Comment 111:

The 2010 'high growth' land use scenario on Massport controlled properties should be, however, regarded as a lower bound. (Page ES-4)

#### Response:

The use of the high and lower growth scenarios in the project's FEIS/FEIR was a requirement imposed by the Federal Transit Administration (FTA) to test the impacts of slower than anticipated development in the South Boston Piers area. While the MBTA has endorsed the high growth scenario as the most accurate representation of future development in the South Boston Piers area (this scenario is consistent with the 2010 land use projections developed by the CA/T Project), it is recognized that some variation will inevitably occur at individual parcels.

#### Comment 112:

A point clarification: the graphic showing the proposed MBTA maintenance facility site at Summer Street/Pappas Way is a bit ambiguous (Figure ES-2). The facility is better shown in an earlier document: Schematic Design Report, November 1992. Figure MF-1 in that report, Alternative A, shows the proposed site. The proposed site occupies part of the Subaru site (water-dependent use) and part of the Pappas site. Massport uses this siting in our assessment of the project.

## Response:

The MBTA recognizes that, at the scale presented in the FEIS/FEIR, the graphic depicting the alternative maintenance facility site boundaries is ambiguous. It should be noted, however, that the MBTA has selected Site B on West First Street between E Street and Pappas Way as the location of its Transitway maintenance facility. Site A at Summer Street/Pappas Way is no longer under consideration.

#### Comment 113:

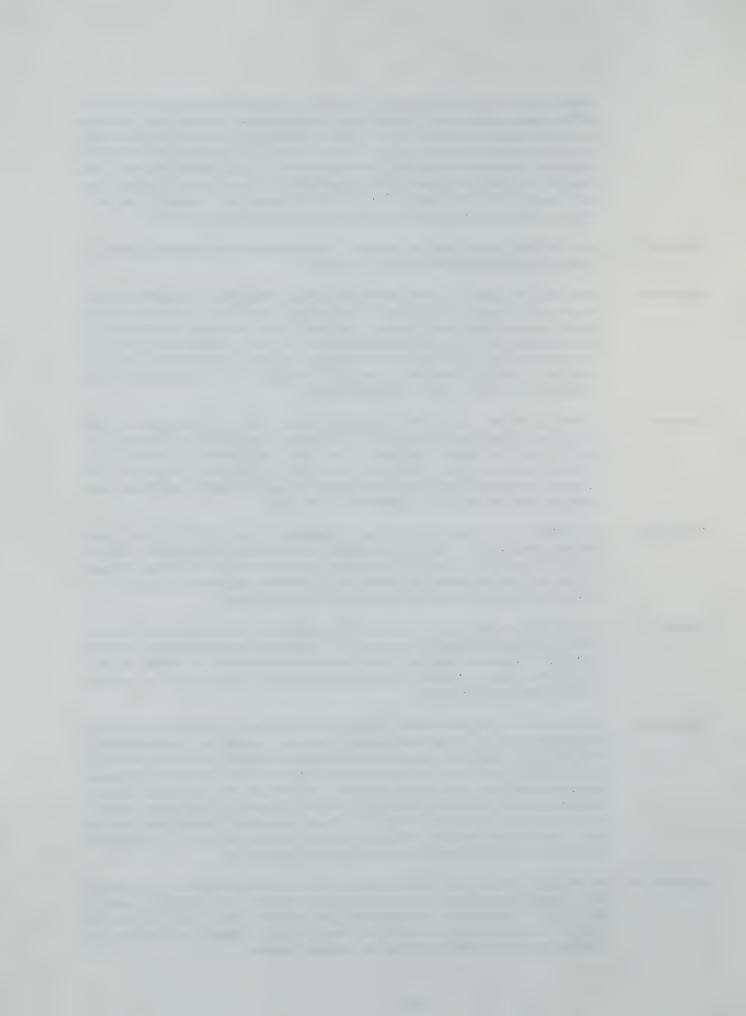
The MBTA's trackless trolley proposal will be powered via overhead catenary; some of these catenaries will be on MPA streets. MPA insists that the MBTA mitigate negative impact with appropriate design. Thus, interagency coordination on design will be a high priority. Massport wishes to retain design review and approval of the catenary system at least on MPA streets.

#### Response:

The Transitway's surface catenary system will be designed in conjunction with other streetscape elements in the South Boston Piers area. The MBTA is currently working with the South Boston Streetscape Committee which has been convened to develop a design for the Piers area's streetscape; committee members, which include representatives from the City of Boston, Massport, and the CA/T Project, will participate in design review and approval. The MBTA will integrate design of the catenary system associated with surface operation of Transitway trackless trolley vehicles with the area's streetscape elements, including lighting, trees, and signage. This integration will ensure compatibility and cohesion of the area's streetscape.

#### Comment 114:

In the 2010 MOS scenario, the only surface street intersection which fails is Massport Haul Road/D Street; this intersection is owned by Massport. This intersection operates at a LOS E – not a failure, but below the Central Artery/Tunnel (CA/T) standard of LOS D. The operation of this intersection needs mitigation; Massport will insist that the CA/T project and the MBTA mitigate this issue appropriately.



#### Response:

Mitigation for the D Street/Massport Haul Road intersection has been recommended by the CA/T Project in their final South Boston Truck Access and Circulation Study (April 1994); this mitigation consists of grade separation of the two roadways. In their review capacity for this study, Massport has been involved in the mitigation of this important Piers area intersection. The CA/T Project is currently revising the truck study to reflect the traffic network for that project's proposed build condition. The revised study will analyze the results of the D Street/Massport Haul Road grade separation on intersections throughout the Piers area in the years 1996 and 2010. Numerous agencies including Massport and the MBTA are participating in the preparation and review of the revised truck study.

#### Comment 115:

Massport wishes to point out that taking a water-dependent site for a non-water-dependent use is contrary to Coastal Zone Management [CZM] objectives, irrespective of relocation assistance.... The Transitway FEIR/FEIS argues that the Maintenance Facility is a non-water-dependent use. One standard that non-water-dependent uses are supposed to meet is "the protection of maritime commerce, industry, recreation and associated public access." The maintenance facility at Subaru is clearly antithetical to achieving this goal. This argues for siting the maintenance facility on the First Street site.

#### Response:

The FEIS/FEIR argues that the Transitway Project, and all of its integral components, comprises a Non-water-Dependent Infrastructure Facility. The project establishes an important public transportation link between downtown Boston and the Piers area. As such, the project creates a broader accessway to the Boston Harbor waterfront while supporting the continued maritime use of the area.

As described above in the response to Comment 109, the MBTA has selected Site B on West First Street for its Transitway maintenance facility.

#### Comment 116:

The MBTA plans to handle [traffic mitigation during construction] on a section design consultant basis.... Traffic mitigation must be coordinated with the CA/T project and World Trade Center (WTC) construction. The entire South Boston area, north of First Street, must be explicitly considered in developing a comprehensive traffic mitigation plan. Massport wishes to retain review and approval regarding the traffic mitigation plan.

#### Response:

The MBTA recognizes the complexity of developing a comprehensive traffic mitigation plan for an area that will encompass multiple concurrent large construction projects. As the largest construction project in the area, the CA/T Project has taken the lead in developing a plan that responds to the concerns of Piers area land owners, tenants, and developers. Both Massport and the MBTA have coordinated with the CA/T Project in the preparation of the final South Boston Truck Access and Circulation Study, and are currently involved in review of the revised study which examines the CA/T Project's proposed build condition. The MBTA's maintenance of traffic plans for construction of the Transitway will be prepared as design of the project proceeds. These plans will be consistent with work currently underway by the CA/T Project, and will incorporate any plans developed for other construction projects, such as the World Trade Center expansion.

#### Comment 117:

The New England Seafood Center – taking or underpinning. From Massport's perspective, taking is the preferred option. This will permit easier, more timely, and ultimately more economical construction. It will also permit the placement of New Congress in its preferred alignment, linking the WTC development to the downtown.



Response:

As described above in the response to Comment 108, the MBTA intends to underpin the New England Seafood Center.

Comment 118:

The Transitway storage and maintenance facility site. The Transitway FEIS/FEIR proposes two sites: one, along First Street along the southern portion of the Pappas parcel; the project's preferred site is comprised of part of the Subaru parcel and the northern part of the Pappas parcel. The Subaru parcel is a water-dependent use. Thus, the Summer Street site is the more environmentally defensible site.

Response:

As described above in the response to Comment 109, the MBTA has selected Site B on West First Street for its Transitway maintenance facility.

Comment 119:

The FEIR states that there will be at-grade pedestrian entrances to the WTC station from C and New Congress Streets (page 2-58). There is no entrance from C Street. There may be an emergency station exit to C Street.

Response:

Massport has correctly noted that there is no entrance to World Trade Center Station from C Street. As shown on Figures A-15 and A-16 in the FEIS/FEIR's *Design Drawings Appendix*, public access to World Trade Center Station will be provided from Viaduct Street with stairs, escalators, and an elevator leading down to the mezzanine and platform levels. Public access will also be provided on the mezzanine level from New Congress Street where fare collection will be located at the west end of the station. Emergency egress walkways are provided at the east end of the station. Ingress and egress details will be coordinated with the World Trade Center development during the final design process.

Comment 120:

The MBTA's preferred alternative is the Full Build alternative. The alternative will be staged... Massport fully supports this incremental development approach. The sooner the Full Build option is realized, the more improved surface street operations will be on Massport street.

Response:

The MBTA has selected the full build Transitway as its locally preferred alternative for implementation. As noted by Massport, implementation of the Transitway will be staged, with the initial build segment extending from South Station to the World Trade Center; this segment is expected to be open for revenue service in the year 2000. Prior to extension of the Transitway tunnel to Chinatown and Boylston Stations, surface shuttle routes are needed to provide connections to the Orange and Green Lines. It is these shuttles that result in higher surface bus volumes on Piers area streets than will be experienced once the full build Transitway is operational by the year 2008. The MBTA shares Massport's desire to implement the full build Transitway and thus optimize surface street operations. The MBTA will work closely with agencies such as Massport to adhere to the proposed implementation schedule for the Transitway.

Comment 121:

The MBTA proposes to portal from tunnel to surface trackless trolley operations at D Street. This portal is on a Massport-controlled street. The Authority requires a traffic operations analysis of this proposed design. The analysis will address all D Street intersection operations from Summer Street to Northern Avenue. The analysis years will be 2000 (or opening year) and 2010 (design year).

Response:

The intersection of the Transitway portal and D Street, as well as all other intersections along D Street from Summer Street to Northern Avenue, are being analyzed by the CA/T Project as part of its South Boston Truck Access and Circulation Study. In



addition, given the close spacing of these intersections, the CA/T Project is conducting a corridor analysis to analyze the potential impacts on intersection level of service as a result of queuing. This analysis is being performed for the years 1996 (the peak construction year for the CA/T Project) and 2010.

The analysis for 2010 assumes the operation of Transitway vehicles associated with the project's full build configuration. Thus, Massport's request for a traffic operations analysis on D Street will be satisfied as part of the CA/T Project's South Boston Truck Access and Circulation Study currently being revised, with input from the MBTA and Massport, as part of the project's forthcoming Notice of Project Change. The CA/T Project's analysis of 1996 conditions, however, does not reflect any Transitway service, since the initial build segment of the Transitway is not scheduled to be open for revenue service until the year 2000. Nevertheless, the MBTA does not believe that a separate effort to further analyze D Street corridor traffic operations in the year 2000 is warranted for two related reasons. First, the CA/T Project must develop mitigation for the D Street corridor as part of its 1996 analysis. This means that the corridor must be shown to be operating an acceptable level, even before the Transitway is introduced into revenue service. Second, since the Transitway is intended to mitigate traffic congestion in the Piers area by providing high quality transit service, the impact of the initial build project on the D Street corridor should be favorable. That is, assuming that D Street corridor intersections are operating at an acceptable level of service beginning in 1996, then the introduction of the Transitway in the year 2000 can be expected to further improve corridor traffic conditions as automobile trips are shifted to transit.



# THE MCCOURT-BRODERICK LIMITED PARTNERSHIP 21 MERCHANTS ROW BOSTON, MASSACHUSETTS 02109

January 26, 1994

Ms. Mary Beth Mello
Deputy Administrator
Federal Transit Administration - Region 1
U.S. Department of Transportation
55 Broadway, Kendall Square
Cambridge, MA 02142

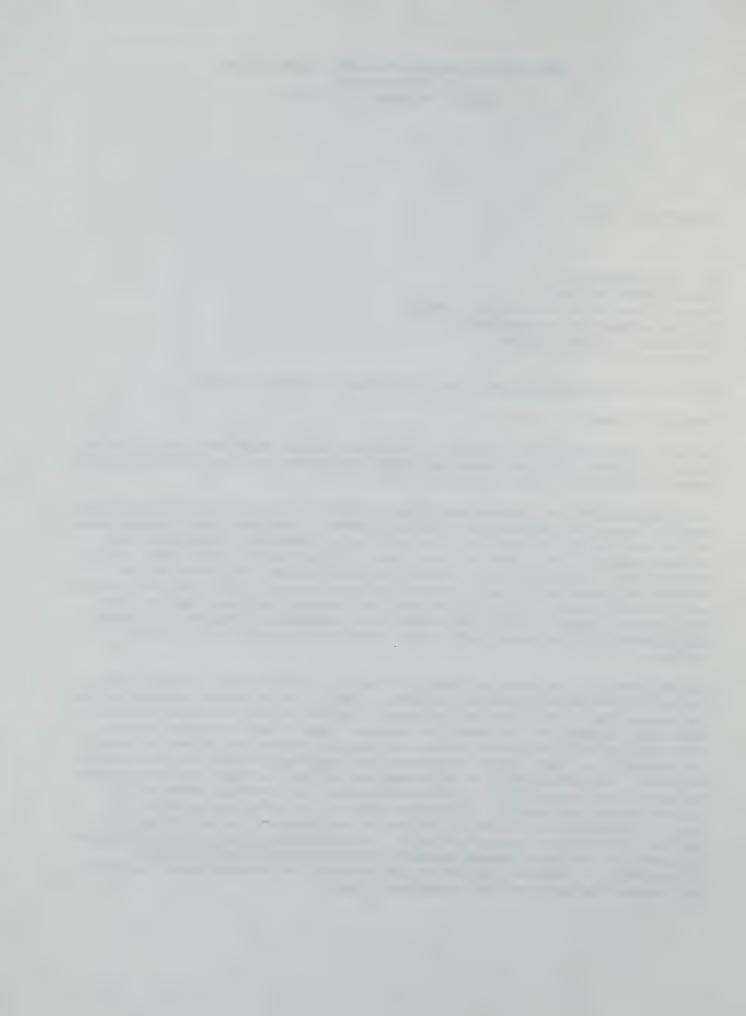
Re: South Boston Piers Piers/Fort Point Channel Transit Project

Dear Ms. Polcari:

Herewith please find our comments on the South Boston Piers/Fort Point Channel Transit Project Final Environmental Impact Statement/Final Environmental Impact Report (FEIS/FEIR), dated December 2, 1993.

As a Boston-based real estate development company with roots that go back more than 100 years, we believe that the South Boston Piers/Fort Point Channel area is the next section of the City that will enjoy tremendous development and economic growth. Our financial commitment to this specific area spans nearly two decades. The South Boston Piers/Fort Point Channel area becoming the gateway to Boston is virtually assured not only because of its seaport location and proximity to both Logan Airport and the Downtown Business District, but also due to infrastructure improvements both planned and underway. Of added significance is that development comes from both the public and private sectors.

As the owner of a substantial amount of land in the Fort Point Channel area, The McCourt-Broderick Limited Partnership (TMBLP) has a vested interest in the implementation of efficient public transit service which is a vital element for future development in the area. At the same time, we are sensitive to the construction and operational issues of a transit system that directly impacts our property and that involves permanent and temporary takings of portions of our land. Our sensitivity is heightened due to the fact that both our engoing business and our development plans have already been severely impaired by eminent domain takings for a number of other public works projects in the area. The number and nature of takings of our property for the project is unclear, and an exact understanding of those portions of our property that are required for the South Boston Piers/Fort Point Channel Transit Project (Transitway) is necessary before we can evaluate the possible impact on both our ongoing business and our development plans.



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With that said, we believe that the Full Build Transitway Alternative offers the best solution for integration with the existing Massachusetts Bay Transportation Authority (MBTA) system and is the alternative that will have the capacity to properly service the South Boston Piers/Fort Point Channel area as this part of the City reaches its full potential in the coming years. It should be noted that even the "high growth" projections of development on our property, set forth in Table 3-4 and on page 3-13 of the FEIS/FEIR, substantially underestimate the scope of project that we have planned. This further reinforces the need for the Full Build Transitway Alternative. As an interim step, if fiscal realities compel a staged approach, we support the second Minimum Operable Segment (MOS-2).

In general, our concerns during construction include: project scheduling, maintenance of continual access to our property, the ability to run an ongoing parking business, informative signage, noise abatement, dust control, security, and business relocation assistance, if necessary. With regard to the permanent condition, we are most concerned that, to the extent possible, we are able to maintain the maximum developability of our property.

Our specific comments related to the FEIS/FEIR are as follows:

## I. Land Takings:

Page 3-13 of the FEIS/FEIR refers to the large number of public rights-ofway across the McCourt Property and the constraints placed on development of these sites. The MBTA should be aware that not only are these sites the locations for ongoing business operations, but that extensive development of the parcels has been planned.

- 122 i) Please identify the location and boundaries of the temporary 51,700 square foot taking in the area of New Northern Avenue and East Service Road mentioned on pages 5-10 of the FEIS/FEIR.
- 123 ii) The land area necessary for the station headhouses has not been specifically identified as an additional taking on pages 5-10 of the FEIS/FEIR. It would be helpful if this issue could be clarified.
- iii) Although we are not certain, it would appear that tunnel vents are located immediately adjacent to the headhouses. This would be an unacceptable condition if we were to include the headhouses within the confines of buildings that are planned for our land. Furthermore, if vents were located adjacent to our buildings, this would seriously diminish the value of said buildings and the underlying property. We had thought that the tunnel vents were to be located in the median strip of New Northern Avenue.
- iv) We were somewhat dismayed by the MBTA reference to Mariners Park, located between Old and New Northern Avenues and East and West Service Roads. Please be advised that we have not been notified of, object to and would strongly resist a taking in this location.



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- v) No indication of any temporary roadway alignment during construction between Sleeper Street and West Service Road along New Northern Avenue appears in the FEIS/FEIR. Hopefully, this is an indication that no such detour will be required. However, if required, we must insist that any temporary taking in this area occur to the south of New Northern Avenue to avoid disruption of current and planned uses of our parcels between existing and New Northern Avenue.
- vi) Because the Boston Transportation Department has determined that Farnsworth Street will not be extended, there will be no direct connection between proposed Headhouse #3 and the new Federal Courthouse. Does this indicate that the MBTA intends to take an easement through our property? Please be advised that we object and will resist any such taking. Substantial costs would be associated with such a right-of-way because it would seriously limit both the uses and developability of this parcel.

In summary, we request specific information concerning what takings will be required for the Transitway, when said takings will occur and, for those takings of a temporary nature, how long said takings will last.

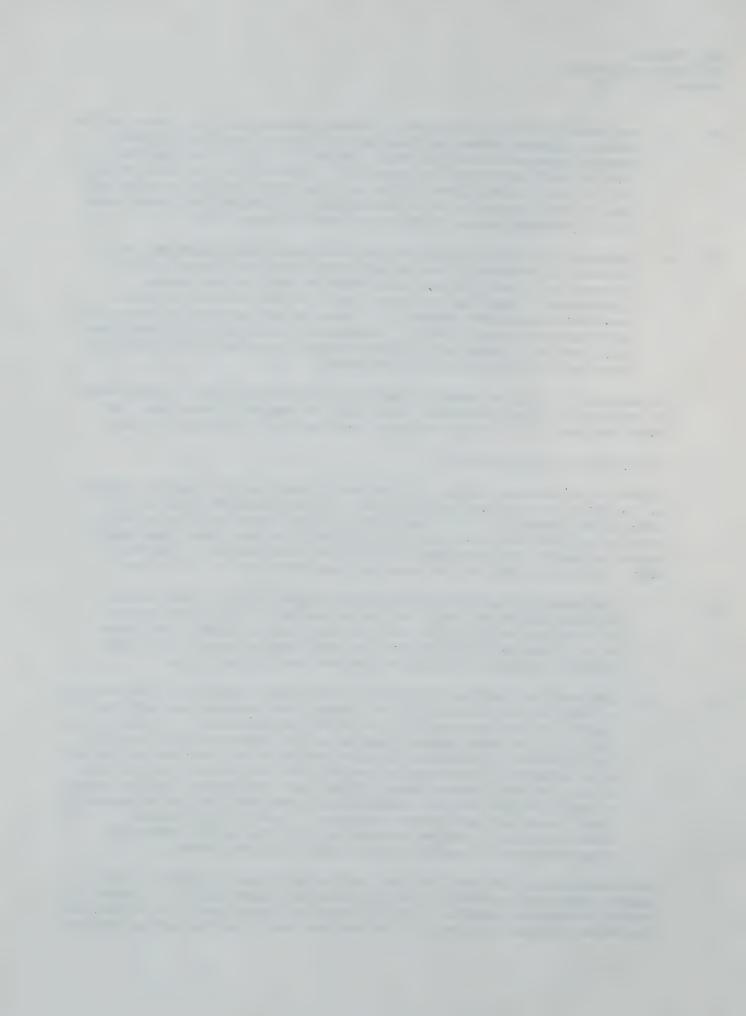
## II. Courthouse Station Location:

Please be advised once again that we are opposed to the location proposed by the MBTA for the Courthouse Station. A comprehensive study of the development potential of the Fort Point Channel area impacted by such a station has concluded that the station should be moved one block east to better stimulate and accommodate the future development of the entire area. Among the factors that must be considered are the following:

- i) The latest Boston Transportation Department's Fort Point Channel
  Street Plans do not call for the extension of Farnsworth Street.

  Because Farnsworth Street will not make such a connection, there will be no direct walkway from the proposed headhouse on the northwest side of Courthouse Station to the new Federal Courthouse.
- ii) The station location proposed by TMBLP which reaches the intersection of New Northern Avenue and the planned West Service Road will be at the hub of activity for the Fort Point Channel area. In addition to the fact that this intersection is at the center point of the Fort Point Channel development district, activity will be greatest in this area because of the number of people traveling on both New Northern Avenue and West Service Road. Given that development usually occurs at easily accessible and identifiable locations, this site appears to have tremendous development potential. Accordingly, public transportation should be included so that the largest number of people may be accommodated in the most efficient manner.

Attached please find two drawings, both dated August 11, 1993, which depict the areas serviced by the proposed Courthouse Station. Drawing "A" shows the station location proposed by the MBTA and Drawing "B" shows both the MBTA proposed location and the one block shift to the east we propose.



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Because access to the new Federal Courthouse is vital, it should be noted that with no Farnsworth Street extension the revised station location as shown on Drawing "B" provides a shorter walking distance to the new Federal Courthouse. The suggested TMELP location is more strategically located within the Fort Point Channel area, slated to accommodate the eventual expansion of the Downtown Business District. Given that the critical mass of new development will occur to the east of the station as proposed by the MBTA, we conclude that the entire area would be better served by a slight easterly shift of the Courthouse Station.

## III. Construction Period:

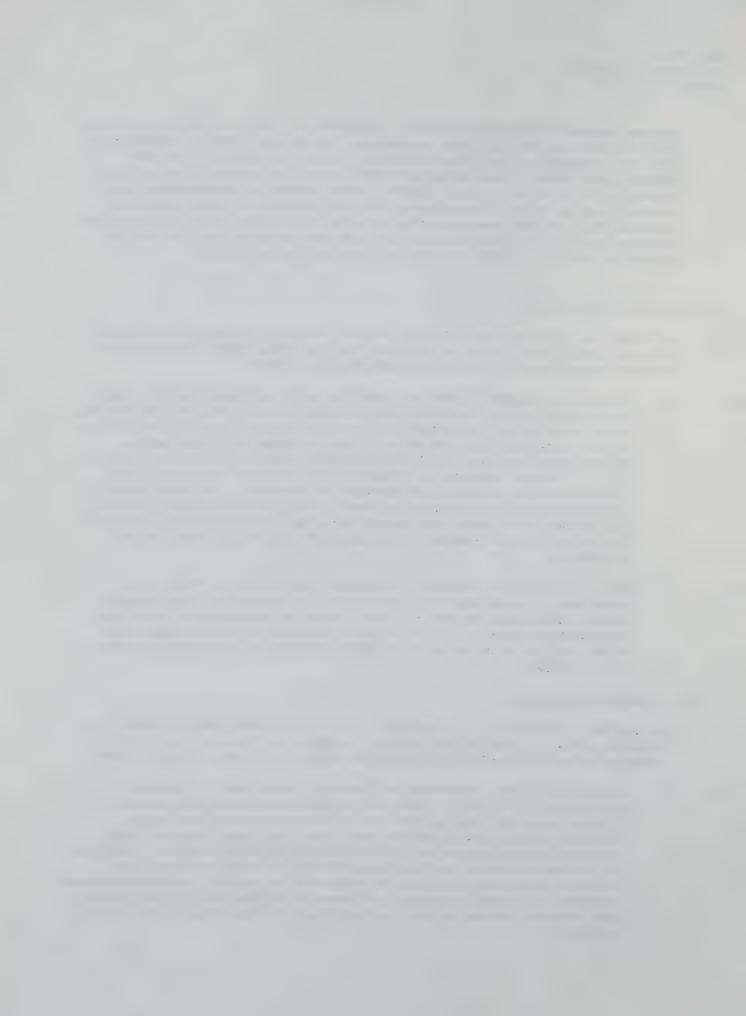
In order to minimize the disruption of our ongoing parking lot business and our development plans, we request that all Transitway construction related activities occur south of New Northern Avenue.

- i) Since the proposed "interim" condition will certainly extend over many years, we are concerned about access to our property and to the piers area during Transitway and Central Artery/Tunnel construction. We would request that the MBTA, in conjunction with the Central Artery/Tunnel project, the Massachusetts Highway Department, and the City of Boston, complete a comprehensive plan and schedule which identifies all construction impacts in the area. The plan should include access to New Northern Avenue, Congress and Summer Streets, and should anticipate the impacts of other construction in the area including the new Federal Courthouse and the World Trade Center expansion.
- ii) When construction activity increases, there will be additional construction equipment and heavy trucking traversing the Congress Street and Summer Street bridges. Have any contingency plans been prepared in the event of structural problems on the bridges that might require a curtailment of heavy traffic or closing of either or both bridges?

## IV. Permanent Condition:

Our primary objective is to maintain the maximum developability and the broadest range of uses of our property within the context of a public transportation system that enhances the entire Fort Point Channel area.

i) According to our structural engineering consultant, a minimum dimension of 20 feet is required between the top of the tunnel and finish grade to minimize the cost of spanning over the tunnel. Attached please find a drawing entitled, "Building Transfer Over Artery Tunnel/Alternative Plans and Transfer Beam Sections" prepared by McNamara/Salvian and designated as "S-1", which delineates a minimum grade beam that will be necessary to support the structure we envision at the point where the tunnel traverses our property from New Northern Avenue to East Service Road at this vitally important corner.



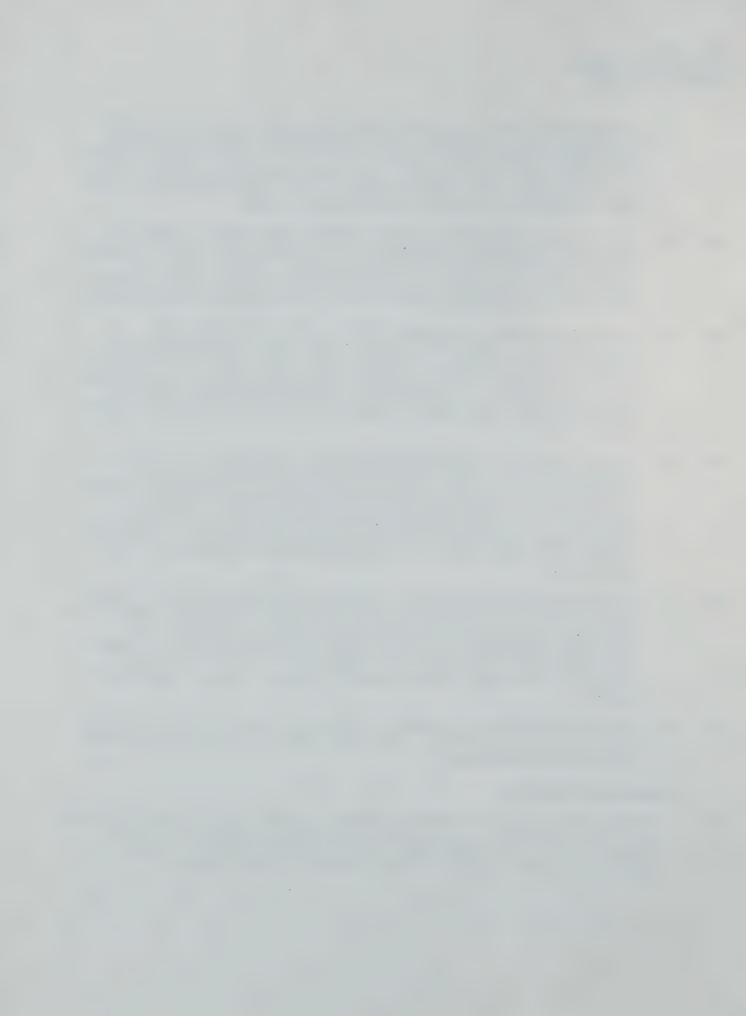
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If we are not able to achieve this 20-foot dimension we may we be permanently precluded from planned development and, according to consultant's estimates, additional construction costs in the millions of dollars would be incurred. A minimum dimension of 20 feet below grade also allows for basement space to be accessed for parking and other services ancillary to the planned building.

- 133 ii) We are deeply concerned about the severe impact of the headhouse locations and the station venting requirements on the development of the parcels adjacent to Courthouse Station. We reiterate our willingness to coordinate our development plans with the Transitway design and construction, particularly in the vicinity of the station.
- 134 iii) We understand that provisions have been made to convert the Transitway to a light rail system at some point in the future if circumstances so warrant. What provisions are being made for the potential conversion to light rail other than the tunnel box design; and, specifically, are provisions being made to carry light rail vehicles across the Central Artery/Tunnel right-of-way east of the D Street Portal?
- iv) We are seeking to understand the volume, character, and planned integration of surface bus transportation. How many surface transportation stations are planned, where will the surface stations be located, and what will they look like? Given the intermodel nature of the Massport Replacement Parking Garage, is this an appropriate location for diesel bus interface in order to limit the number of surface stops in the high development locations in the piers area?
- 136 v) Although the FEIS/FEIR states on page 5-20 that a new station will serve the World Trade Center expansion project, it is not clear as to how the general public accesses said station. Because of the different elevations involved at the station, the means of ingress and egress to public ways is not apparent. So that the largest segment of the public can utilize the station, please clarify this point.
- vi) When the Transitway project is completed, we are also concerned with the issues of vibrations, noise, air quality, security, cleanliness, and ongoing maintenance.

#### V. <u>Decisions Remaining:</u>

138 Concerning the two key unresolved decisions referred to on pages ES-34 and 6-36 of the FEIS/FEIR, we would appreciate being advised of both the process that will be established for making the remaining decisions and the method by which we will be kept informed of your progress.



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The favorable impacts of public projects such as the construction of New Northern Avenue, the improved local street network, the new Federal Courthouse, the depression of the Central Artery, the extension of the Massachusetts Tumpike and the construction of the Third Harbor Tunnel certainly enhance the desirability of developing the Fort Point Channel area. A direct response to these projects is reflected in the planned expansion of both the World Trade Center and The Children's Museum, the ongoing rehabilitation of numerous buildings by the Boston Wharf Company, and the mixed-use developments planned by us and the Pritzker interests. The South Boston Piers/Fort Point Channel area is the best location in the entire region because of its access both north and south via Routes 93 and 95 and west via Route 90. An effective public transit system should complete the transportation requirements for this section of Boston and allow it to achieve its full potential.

Despite the existence of the previously stated concerns, please be assured that we recognize and acknowledge the significant amount of progress that has been made on the transportation issues that are so vital to the development of the South Boston Piers/Fort Point Channel area. Subject to our concerns, we remain eager to cooperate with the MBTA, other public agencies, and our abuttors in working toward the implementation of an efficient and well-designed public transportation system in this area.

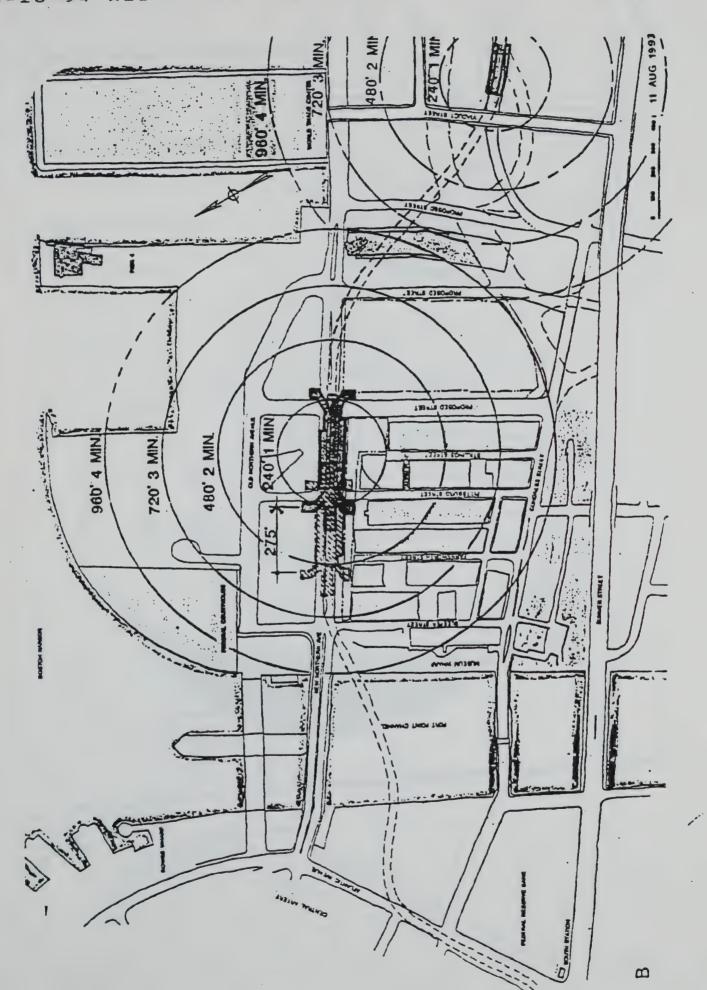
Sincerely,

Austin P. Regolino
Project Executive

APR/jm

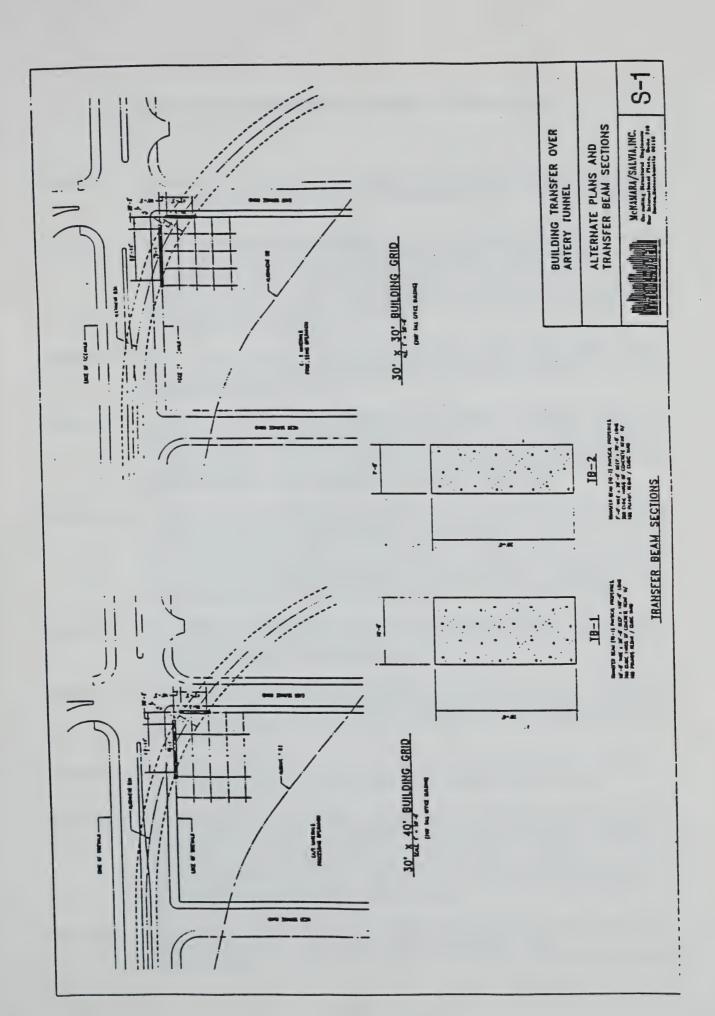
Attachments

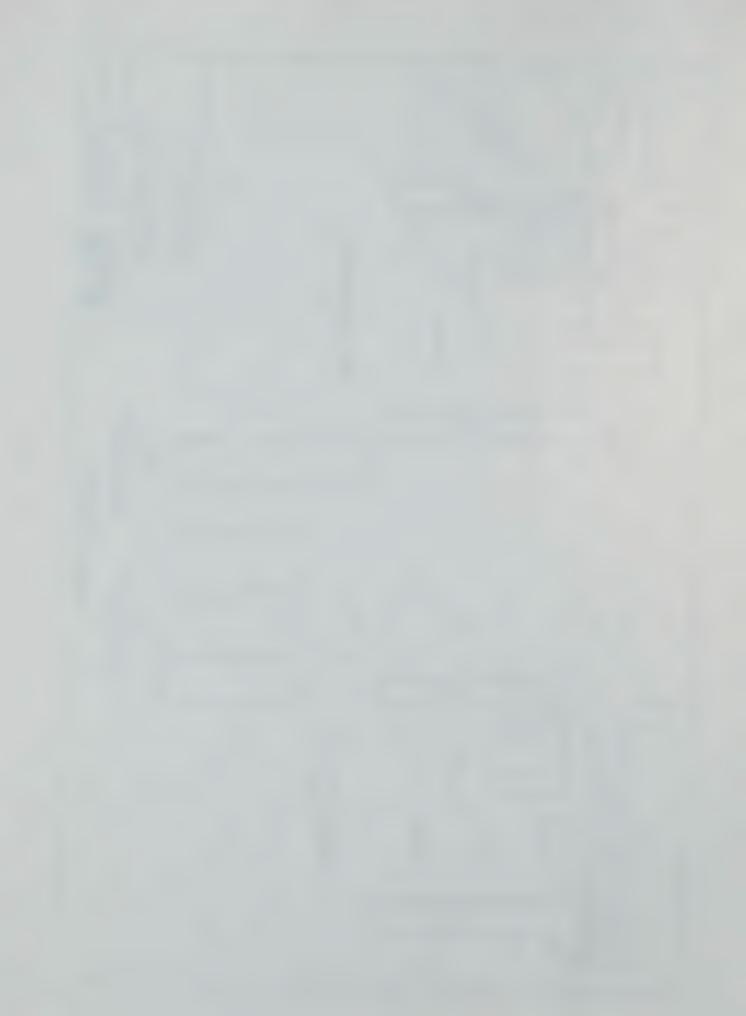












## The McCourt-Broderick Limited Partnership

Comment 122:

Please identify the location and boundaries of the temporary 51,700 square foot taking in the area of New Northern Avenue and East Service Road mentioned on pages 5-10 of the FEIS/FEIR.

Response:

The 51,700 square foot area represents a temporary acquisition located on the north side of New Northern Avenue between Sleeper Street and the East Service Road. This temporary acquisition will be used for a proposed detour of New Northern Avenue during the construction of the Transitway under New Northern Avenue. This detour location was proposed in the preliminary design phase and will be coordinated as part of final design of the Transitway.

Comment 123:

The land area necessary for the station headhouses has not been specifically identified as an additional taking on pages 5-10 of the FEIS/FEIR. It would be helpful if this issue could be clarified.

Response:

Land area needed for station headhouses is included in current estimates of land acquisitions and easements, and does not represent an additional acquisition. Permanent easements for the station headhouses will be required and will be established as part of the final design process. Close coordination with proposed adjacent development will be required during the final design phase.

Comment 124:

Although we are not certain, it would appear that tunnel vents are located immediately adjacent to the headhouses. This would be an unacceptable condition if we were to include the headhouses within the confines of buildings that are planned for our land. Furthermore, if vents were located adjacent to our buildings, this would seriously diminish the value of said buildings and the underlying property. We had thought that the tunnel vents were to be located in the median strip of New Northern Avenue.

Response:

The location of Transitway tunnel vents will be determined during subsequent project design phases. Placement of tunnel vents will be coordinated with proposed development along the Transitway alignment.

Comment 125:

We were somewhat dismayed by the MBTA reference to Mariners Park, located between old and New Northern Avenues and East and West Service Roads. Please be advised that we have not been notified of, object to and would strongly resist a taking of this location.

Response:

The reference to Mariners Park located between old and New Northern Avenues and East and West Service Roads should have been omitted in the FEIS/FEIR.

Comment 126:

No indication of any temporary roadway alignment during construction between Sleeper Street and West Service Road along New Northern Avenue appears in the FEIS/FEIR. Hopefully, this is an indication that no such detour will be required. However, if required, we must insist that any temporary taking in this area occur to the south of New Northern Avenue to avoid disruption of current and planned uses of our parcels between existing and new Northern Avenue.

Response:

Although the temporary acquisition described above in the response to Comment 122 represents a detour north of New Northern Avenue, actual detours associated with construction of the Transitway will not be known until design of the project progresses.



The MBTA will coordinate with the McCourt-Broderick Limited Partnership as maintenance of traffic plans are developed to ensure that appropriate mitigation is identified while minimizing impacts to current and planned uses of McCourt's parcels along New Northern Avenue.

## Comment 127:

Because the Boston Transportation Department has determined that Farnsworth Street will not be extended, there will be no direct connection between proposed Headhouse No. 3 and the new Federal Courthouse. Does this indicate that the MBTA intends to take an easement through our property? Please be advised that we object and will resist any such taking. Substantial costs would be associated with such a right-of-way because it would seriously limit both the uses and developability of this parcel.

## Response:

The MBTA does not currently plan to acquire an easement along the former proposed right-of-way for Farnsworth Street Extension. While such an easement would be advantageous to provide safe and direct pedestrian access to the Federal Courthouse from the northwest side of Courthouse Station, the MBTA intends to provide clear signage and other pedestrian safety features at the location of the station's headhouses to substitute for a direct walkway.

#### Comment 128:

The latest Boston Transportation Department's Fort Point Channel Street plans do not call for the extension of Farnsworth Street. Because Farnsworth Street will not make such a connection, there will be no direct walkway from the proposed headhouse on the northwest side of Courthouse Station to the new Federal Courthouse.

#### Response:

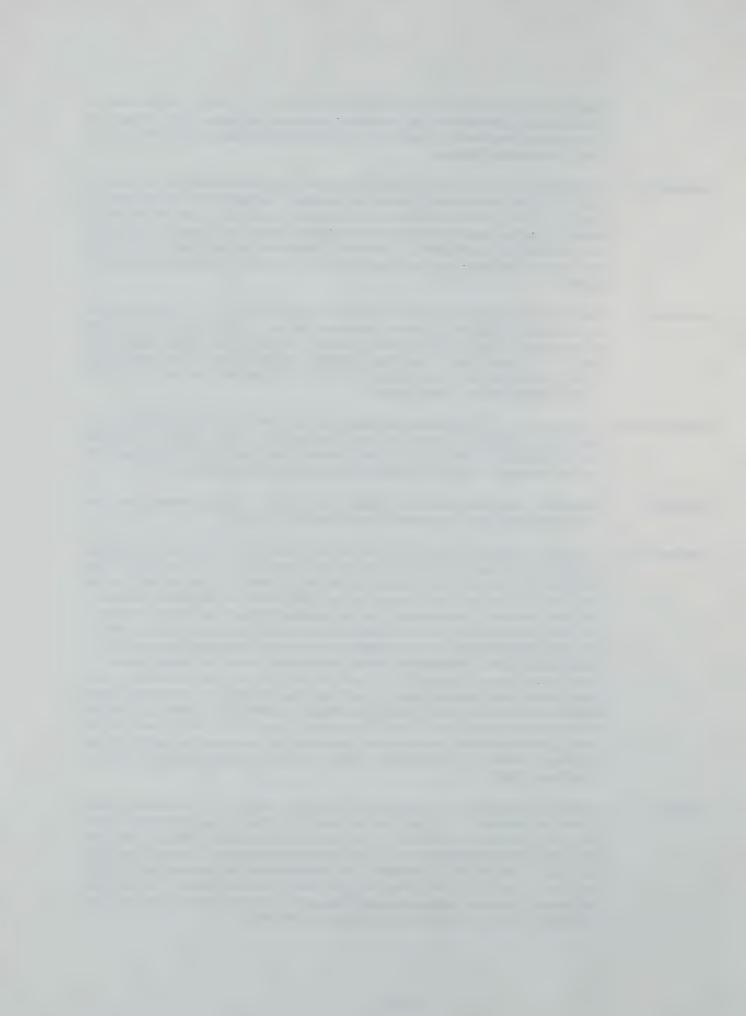
The MBTA acknowledges that no right-of-way exists for a direct walkway from the northwest side of Courthouse Station to the Federal Courthouse.

#### Comment 129:

The station location proposed by TMBLP which reaches the intersection of New Northern Avenue and the planned West Service Road will be at the hub of activity for the Fort Point Channel area. In addition to the fact that this intersection is at the center point of the Fort Point Channel development district, activity will be greatest in this area because of the number of people traveling on both New Northern Avenue and West Service Road. Given that development usually occurs at easily accessible and identifiable locations, this site appears to have tremendous development potential. Accordingly, public transportation should be included so that the largest number of people may be accommodated in the most efficient manner. Because access to the new Federal Courthouse is vital, it should be noted that with no Farnsworth Street extension the revised station location as shown on Drawing "B" provides a shorter walking distance to the new Federal Courthouse. Given that the critical mass of new development will occur to the east of the station as proposed by the MBTA, we conclude that the entire area would be better served by a slight easterly shift of the Courthouse Station.

## Response:

In siting its Piers area Transitway stations, the MBTA has sought to balance numerous competing interests. The MBTA is confident that it has made appropriate siting decisions, given its understanding of trip demand generated by existing uses in the area, and of projected demand that will be generated by approved near-term projects, such as the new Federal Courthouse. The Transitway stations are designed to serve both existing and future development as quantified for the CA/T Project. The MBTA is not aware of any approved changes in Piers area development plans that would call into question the station siting decisions that have been made.



The MBTA has met with public agencies, including the Boston Transportation Development (BTD), Boston Redevelopment Authority (BRA), Massachusetts Highway Department (MHD), and the General Services Administration, and private interests, such as the McCourt-Broderick Limited Partnership and the Children's Museum, to address concerns about Courthouse Station as documented in comment letters submitted on the project's FEIS/FEIR. Issues discussed with these public and private interests include safety, pedestrian access, and future development in the Piers area. After consideration of the various concerns and competing interests identified and discussed in these meetings, the MBTA has determined that the location of the Courthouse Station, including the headhouses as proposed in the FEIS/FEIR, is appropriate, and should not be changed. However, other mitigation measures to address concerns expressed during meetings with public and private interests will be implemented. These measures are discussed later in this section, following a brief description of the rationale for the proposed Courthouse Station siting decision.

The two Piers area Transitway stations – Courthouse and World Trade Center Stations – were sited to provide maximum transit coverage of the area. These stations were sited by the MBTA with input from state and city planners, including the BRA and Massport, as well as from Piers area property owners and developers.

Alternative locations for Courthouse Station at Sleeper and Pittsburgh Streets were considered during station siting. Neither of these locations is as advantageous as the proposed Farnsworth Street location. Of primary importance is that the Courthouse Station be as close as possible to the new Federal Courthouse. The proposed Farnsworth Street location is directly opposite (although a block away from) the main entrance of the Courthouse. Although a Courthouse Station shifted west to Sleeper Street would be dramatically sited on the waterfront, engineering for such a shift is not feasible for a number of reasons.

Specifically, the proposed Courthouse Station platforms are located on a tangent (i.e., straight) section. Moving the station west would place the platforms on a curve. Since a tangent section is required for station platforms, the Transitway alignment west of Sleeper Street would need to be redesigned. Such a realignment is not feasible, however, since it would result in an adverse impact to the abutment of the New Northern Avenue Bridge. Alternatively, the current proposed platform location could be maintained, and the headhouses relocated to Sleeper Street. This extension of the accessways to Courthouse Station would result in a much larger and more costly station. Furthermore, the construction of the New Northern Avenue Bridge immediately adjacent to Sleeper Street headhouses would pose safety problems for transit passengers entering or exiting the station. Cars coming off the incline of the New Northern Avenue Bridge will reach grade at the intersection of Sleeper Street and New Northern Avenue. As cars come down the incline, they are likely to be accelerating. Similarly, as motorists approach the bridge incline, their natural instinct would be to accelerate. The safety of Transitway station users and other pedestrians could be jeopardized by the six lanes of accelerating traffic and motorists with poor sight lines at the intersection of Sleeper Street and New Northern Avenue.

A station location at Pittsburgh Street would be located too far from the Federal Courthouse, existing development along the western edge of the Fort Point Channel, and a potential future water shuttle terminal at Fan Pier. It is desirable from both wayfinding and urban design perspectives that the headhouses be as close as possible to, and visible from, the channel and the Fan Pier. Along with the future Federal Courthouse, these are two of the Piers area's strongest geographical features.



The Courthouse Station location at the western edge of the Piers area was chosen specifically to serve existing developments, including Museum Wharf (consisting of the Children's Museum, Computer Museum, and Boston Tea Party Ship Museum) and the Boston Wharf Company. Approximately one-third of existing development in the Piers area is focused there. This development consists primarily of office uses, which generate a high level of trip demand per square foot of development.

A one-quarter mile walk radius was used to analyze station locations with respect to their ability to serve area development. To avoid overlap of these radii and maximize the cost-effectiveness of the project, the two stations were spaced roughly one-half mile apart. The northwest entrance to Courthouse Station is located across from the new Federal Courthouse at Fan Pier (within a two-minute walk distance), and a southwest entrance provides access to the Boston Wharf Company buildings and to Museum Wharf. Using a one-quarter mile walk distance, Courthouse Station will also serve developments in the easternmost portion of the Financial District, including International Place.

In their comments on the Transitway's Draft Environmental Impact Report, officials from the Computer Museum stressed that the Courthouse Station should remain as close to Museum Wharf as possible. Museum Wharf currently attracts over a million visitors each year, and museum directors believe that convenient, accessible transit is likely to capture a considerable portion of these visitors and Museum staff if the service meets their needs. Needs include a short walk distance from the Transitway station, and easily accessible vehicles that can accommodate strollers, baby carriages, and wheelchairs. Future transportation developments, such as water shuttle services expected to dock at Fan Pier, and the existing Northern Avenue Bridge, which is proposed for conversion as an enhanced pedestrian walkway, would also be well-served by station headhouses in the vicinity of Farnsworth Street.

Based on these factors, the MBTA believes that the Piers area would be ill-served by a relocation of Courthouse Station. While the MBTA recognizes that pedestrian safety is of paramount concern given the midblock location of station headhouses in the vicinity of Farnsworth Street, such headhouse locations have been successful elsewhere in the MBTA system. For example, the Kendall and Kenmore Stations are at mid-block locations. Easy access to these stations is achieved in several ways. At Kenmore Station, headhouses on either side of Commonwealth Avenue lead to a mezzanine, while passengers accessing Kendall Station are eased across the highly defined mid-block crossing by flags set into the median of Main Street in Cambridge and a pedestrian actuated signal.

As described in the FEIS/FEIR, Courthouse Station will be designed with a mezzanine accessible from both sides of New Northern Avenue. Other mitigation measures that the MBTA commits to implement with approval from such agencies as the BTD include the following:

• Courthouse Station entrance/exit at Pittsburgh Street. The headhouse located at the southeastern corner of New Northern Avenue and Pittsburgh Street will be open as a Courthouse Station entrance/exit. Previously, this headhouse was designated as an emergency exit only, with the main station entrance/exit headhouses located on both sides of New Northern Avenue in the vicinity of Farnsworth Street. The designation of all three headhouses for station entrance/exit will improve pedestrian circulation at Courthouse Station, and will now allow pedestrians to access the station at the New Northern Avenue/Pittsburgh Street signalized intersection.



- Installation of a barrier. A fence or other barrier along the New Northern Avenue median would prevent mid-block crossings. The current median plan for New Northern Avenue does not provide for any such barrier. The MBTA will work with other agencies, such as the BRA, on the final landscaping plan for the New Northern Avenue median. In combination with a median barrier, a pedestrian actuated signal could be installed at the midblock headhouse location. A change in the color and material of the crossing could also be provided to alert motorists that this is a pedestrian crossing. At a minimum, the crosswalk striping here should be very wide so motorists have a strong visual cue that crossings may occur.
- Clear signage and graphics. Provision of clear signage and graphics both at the station level underground and at the street level will greatly facilitate communication with pedestrians. Prominent below level signage will direct exiting passengers to the appropriate side of New Northern Avenue so they can reach their destinations without crossing the street at the surface. Headhouses at street level will be marked by a strong and highly visible design. It is also the intention of the MBTA to have a community relations person in the station to answer questions and direct station users to destinations in the Piers area.

#### Comment 130:

Since the proposed "interim" condition will certainly extend over many years, we are concerned about access to our property and to the piers area during Transitway and Central Artery/Tunnel construction. We would request that the MBTA, in conjunction with the Central Artery/Tunnel project, the Massachusetts Highway Department, and the City of Boston, complete a comprehensive plan and schedule which identifies all construction impacts in the area. The plan should include access to New Northern Avenue, Congress and Summer Streets, and should anticipate the impacts of other construction in the area including the new Federal Courthouse and the World Trade Center expansion.

#### Response:

As the largest construction project in the area, the CA/T Project is preparing a *South Boston Truck Access and Circulation Study* which will result in a maintenance of traffic plan for the Piers area during CA/T construction. While each additional construction project, such as the Transitway, is responsible for development of its own maintenance of traffic plans to be used by the project contractor during construction, the CA/T Project's study will provide the basis for preparing these plans for other projects. The MBTA's design consultants will prepare maintenance of traffic plans for each Transitway construction contract; these plans will consider the results of the CA/T Project's study, as well as the impacts of any other concurrent construction projects in the Piers area. These plans will be subject to review and approval by various regulatory agencies.

#### Comment 131:

When construction activity increases, there will be additional construction equipment and heavy trucking traversing the Congress Street and Summer Street bridges. Have any contingency plans been prepared in the event of structural problems on the bridges that might require a curtailment of heavy traffic or closing of either or both bridges?

## Response:

Final design of the Transitway must satisfy the requirements of regulatory agencies, including the use of existing bridges for project construction vehicles. Consideration by these agencies should be given to the adequacy of the existing Congress Street and Summer Street Bridges by the appropriate regulatory agencies. In addition, the New Northern Avenue Bridge is scheduled to be open to traffic by the fall of 1995. Details about construction truck traffic, including volumes and routing, have not yet



been developed for the Transitway Project. These details, which will be available as design of the project proceeds, will be provided by the MBTA's section designers.

## Comment 132:

According to our structural engineering consultant, a minimum dimension of 20 feet is required between the top of the tunnel and finish grade to minimize the cost of spanning over the tunnel. Attached please find a drawing entitled, "Building Transfer Over Artery Tunnel/Alternative Plans and Transfer Beam Sections" prepared by McNamara/Salvian and designated as "S-1", which delineates a minimum grade beam that will be necessary to support the structure we envision at the point where the tunnel traverses our property from New Northern Avenue to East Service Road at this vitally important corner.

If we are not able to achieve this 20-foot dimension we may be permanently precluded from planned development and according to consultant's estimates, additional construction costs in the millions of dollars would be incurred. A minimum dimension of 20 feet below grade also allows for basement space to be accessed for parking and other services ancillary to the planned building.

## Response:

Resolution of this issue must occur during the final design of the Transitway. Ongoing coordination between TMBLP and the MBTA will be continued throughout this design phase.

#### Comment 133:

We are deeply concerned about the severe impact of the headhouse locations and the station venting requirements on the development of the parcels adjacent to Courthouse Station. We reiterate our willingness to coordinate our development plans with the Transitway design and construction, particularly in the vicinity of the station.

#### Response:

The MBTA appreciates TMBLP's willingness to coordinate on design issues in the vicinity of Courthouse Station. Ongoing coordination will facilitate the development of design solutions satisfactory to both parties.

### Comment 134:

We understand that provisions have been made to convert the Transitway to a light rail system at some point in the future if circumstances so warrant. What provisions are being made for the potential conversion to light rail other than the tunnel box design; and, specifically, are provisions being made to carry light rail vehicles across the Central Artery/Tunnel right-of-way east of the D Street Portal?

## Response:

Key features of the Transitway, including horizontal and vertical alignment and clearances, electrical power, and station platforms, have been designed to permit a potential future conversion to light rail if warranted by a change in the demand characteristics of the Piers area. An extended Transitway tunnel would still need to portal north of the Seaport Access Road right-of-way, since there is currently no provision for a Transitway tunnel either above or beneath the Seaport Access Road. Extension of the Transitway tunnel to a portal east of D Street would require coordination with Massport, which controls the development rights of the parcel east of D Street. The MBTA has discussed this issue with Massport.

#### Comment 135:

We are seeking to understand the volume, character, and planned integration of surface bus transportation. How many surface transportation stations are planned, where will the surface stations be located, and what will they look like? Given the intermodal nature of the Massport Replacement Parking Garage, is this an appropriate location for diesel bus interface in order to limit the number of surface stops in the high development locations in the piers area?



## Response:

In the FEIS/FEIR, the MBTA proposed one route structure for supplemental surface diesel buses in the year 2000 when the initial build Transitway will be operational, and another route structure in 2010 when the full build Transitway will be completed. These two route structures reflect the MBTA's expected response to projected trip demand consistent with future development of the Piers area in 2000 and 2010. The MBTA believes, however, that refinements to the surface route structures and the location of bus stops in the Piers area should be made as actual development occurs. For ridership estimation purposes, representative bus stop locations were specified in the analysis. Actual bus stop locations will be determined upon consultation among MBTA planners and operations and community interests, the latter including the developers of Piers area projects. The service plans shown in the FEIS/FEIR should thus be viewed as conceptual only.

The MBTA does not view as the best option the suggestion that all surface bus boardings and alightings for the Piers area take place in the Massport Replacement Parking Garage. While it was determined that the Massport garage is a good station location in combination with another station serving the western portion of the Piers area (Courthouse Station), it would be insufficient as the sole Piers station due to the size of the service area. During early phases of transit alternatives analysis, a single and more centrally located station was studied, and the MBTA found that a single station was inadequate from a level of service and ridership point of view. Relatedly, a single stop for all supplemental bus routes would underserve the Piers area, and would likely worsen traffic conditions in the vicinity of the parking garage. The final plan for bus circulation and bus stops needs to balance the convenience of the riders against the traffic impacts of bus stops.

Bus stops would not require elaborate facilities, but would include shelters and benches for stops where passengers are likely to be waiting (downtown-bound direction). No schematic drawings have been prepared yet for surface stops. The MBTA will work with community interests and the city to ensure that the bus stops are designed to suit guidelines in the development area. The size of each stop will be commensurate with the total frequency of bus service. For example, in the full build Transitway, surface routes include only one shuttle route (the North Station shuttle), two local routes, and eight express routes. Most of the routes operate only four times per hour, except for the shuttle service to North Station from the western Piers area and the local route to North Station from the Boston Marine Industrial Park (BMIP). The North Station shuttle operates 17 trips per hour (every 3.5 minutes), while the local route to North Station from BMIP operates eight trips per hour (every 7.5 minutes). The combined frequency of express buses is 32 buses per hour, or eight buses every 15 minutes if all routes were operated at the same schedule.

#### Comment 136:

Although the FEIS/FEIR states on page 5-20 that a new station will serve the World Trade Center expansion project, it is not clear as to how the general public accesses said station. Because of the different elevations involved at the station, the means of ingress and egress to public ways is not apparent. So that the largest segment of the public can utilize the station, please clarify this point.

## Response:

As shown on Figures A-15 and A-16 in the FEIS/FEIR's *Design Drawings Appendix*, public access to World Trade Center Station will be provided from Viaduct Street with stairs, escalators, and an elevator leading down to the mezzanine and platform levels. Public access will also be provided on the mezzanine level from New Congress Street where fare collection will be located at the west end of the station. Emergency egress walkways are provided at the east end of the station. Ingress and egress details will



be coordinated with the World Trade Center development during the final design process.

Comment 137:

When the Transitway project is completed, we are also concerned with the issues of vibrations, noise, air quality, security, cleanliness, and ongoing maintenance.

Response:

Maintaining safe, clean, and attractive stations is a high priority of the MBTA. Attractive stations enhance both usage of the transit system and the surrounding environment. Relatedly, the MBTA encourages the incorporation of transit station kiosks within private developments to the mutual benefit of riders, developers, and the MBTA. The MBTA also welcomes input from land owners such as McCourt in improving the appearance and operation of its transportation facilities.

Comment 138:

Concerning the two key unresolved decisions referred to on pages ES-34 and 6-36 of the FEIS/FEIR, we would appreciate being advised of both the process that will be established for making the remaining decisions and the method by which we will be kept informed of your progress.

Response:

The MBTA has held a series of meetings with public agencies, private developers, and business and community organizations to discuss and resolve issues raised by reviewers of the FEIS/FEIR. The two key unresolved decisions were also discussed at those meetings. In accordance with the Certificate issued by the Secretary of Environmental Affairs on the transit project's FEIS/FEIR, previously unresolved decisions are made in this Draft Section 61 Finding. The MBTA welcomes the opportunity to respond directly to any issues or concerns about the project, and requests that all inquiries be addressed to the Project Office.





# Metropolitan Area Planning Council

60 Temple Place, Boston, Mass. 02111 617/451-2770 Fax 617/482-7185

Serving 101 cities and towns in metropolitan Boston

January, 26, 1994

The Honorable Trudy Coxe, Secretary Executive Office of Environmental Affairs MEPA Unit 100 Cambridge Street Boston, MA 02202

Project Identification:

Project Name: South Boston Piers Transitway

Project Proponent: MBTA

Location: Boston

EOEA: 6826

## Dear Secretary Coxe:

The Metropolitan Area Planning Council regularly reviews development proposals deemed to have regional impacts. These proposals are reviewed for compliance with MetroPlan 2000, the regional plan for the Boston metropolitan area, as well as for their impact upon the environment.

The MAPC would like to restate our support for the eventual construction of the Full-Build Transitway alternative when economic and financial circumstances warrant. However, we recommend that, in the immediate future the MBTA and 139 relevant state agencies focus attention on ensuring that the joint construction aspects of this and the Central Artery Tunnel projects be moved forward, as well as commitments made by other development projects such as the MassPort Parking Garage on Commonwealth Pier are carried out to reserve the future viability of the Transitway project.

#### Growth Estimates

MAPC continues to believe that short-term development 140 patterns illustrate that the Piers area development is substantially below the projections made by the Central Artery Tunnel project. This reinforces the need for new growth projections for the Piers area. ISTEA has required that planning assumptions be updated on a regular basis, and that plans be updated at least every three years. These updates include reviewing and revising, as necessary, growth

Edmund P. Tarallo, President William G. Constable, Vice-President

Dianne M. Shea, Secretary

Richard A. Easler, Treasurer



estimates. In 1990 the, Urban Mass Transportation Administration, released a report "Urban Rail Transit Projects: Forecast vs. Actual Ridership." This study noted that, for urban rail and people mover projects, transit ridership was consistently overestimated to justify new transit extensions. These inflated estimates lead to unrealistically high fare revenue and underestimation of the deficits that systems will experience.

## Financial Analysis

## Capital Funding

- 1. The FEIS does not address the financial impact on the 141 MBTA of the project only receiving 50% federal funding as was required by the Federal Transit Administration. This is a significant problem in the FEIS that is carried over from previous environmental submittals. Instead of addressing this very realistic lack of federal funds the MBTA proposes to seek increased federal funding for the project in the "ISTEA Technical Corrections Bill" that will be filed in 1994. First, this approach does not address the FTA requirement to review a lower federal share for the project. Second, the hope for increased federal funding does not appear to be realistic given current federal attempts to reduce spending on the Demonstration Projects that were included in ISTEA. And, finally, the Chairman of the House Transportation Appropriations Subcommittee, Rep. Robert Carr of Michigan, has voiced opposition to a technical corrections bill that includes new funding commitments.
- 142 2. The MBTA should not count on the use of Congestion Mitigation and Air Quality or Surface Transportation Program funding for this or other projects without consulting with the MPO agencies that represent local governments. Over the past two years the MAPC cities and towns have sacrificed local transportation projects that have allowed the MBTA to maximize the funds available to the Old Colony Railroad Restoration project and provide improvements at nistoric rail stations.
- 3. The FEIS suggests that the construction schedule can be tailored to the availability of 80% federal funding, even if construction delays are required. Construction delays, inevitably mean increased construction costs. The FEIS does not provide any estimate of increases in costs due to the lack of 80% federal funding. If the project is solely delayed due to funding availability, increased costs, proportional to those of the Central Artery project could be anticipated.
- 144 Further, we would like to see the FEIS consider the future cost estimate for the project based upon anticipated costs in the year individual contracts may be let. This is



particularly important to estimate the true federal funding needs for this project and would allow for anticipating some of the cost increases that have befallen large projects such as the Central Artery project.

## Financial Feasibility

Table 6-3 of the FEIS illustrates fluctuations in annual state assistance to the MBTA. In some years the state assistance is expected to increase by about 9% and in other years by less than 5%. These fluctuations are used to provide an average increase between 1993 and 2015 of around 5.1%. MAPC would suggest that the increases over 5.1% in any given year are unrealistic since this has been the cap in increases in assistance in recent years. We would suggest that financial viability for this project would hinge on the ability for the MBTA to cover expenses and not reduce services within the 5.1% year to year increase fiscal constraint.

Sincerely,

David C. Soule, Executive Director

cc: Mary Beth Mello, Federal Transportation Administration Marc Webb, Boston Redevelopment Authority Rina Cutler, Boston Transportation Department Anne Larner, MBTA Advisory Board Daniel J. Fortier, Chief Transportation Planner Kent Stasiowski, Project Review Coordinator



## **Metropolitan Area Planning Council**

#### Comment 139:

We recommend that, in the immediate future the MBTA and relevant state agencies focus attention on ensuring that the joint construction aspects of this and the Central Artery tunnel projects be moved forward, as well as commitments made by other development projects such as the MassPort Parking Garage on Commonwealth Pier are carried out to reserve the future viability of the Transitway project.

## Response:

The MBTA appreciates MAPC's support of the Transitway Project, and wants to assure the Council that the MBTA and relevant state agencies are focused on coordinating the Transitway with other projects along the Transitway's alignment. This coordination, which includes incorporation of key Transitway elements in the CA/T Project's C11A1 construction contract, affords benefits to the agencies involved and the public at large, including substantial cost savings and critical reductions in negative environmental impacts. Meetings are ongoing with all relevant state agencies, including the CA/T Project and Massachusetts Port Authority (Massport), to ensure that coordination between the three public projects — Transitway, CA/T, and parking garage — is timely and thorough. A unique opportunity exists for the state's major transportation agencies to act in concert to develop coordinated solutions to the region's mobility needs, and the MBTA is committed to maintaining a high level of cooperation as the Transitway Project moves ahead.

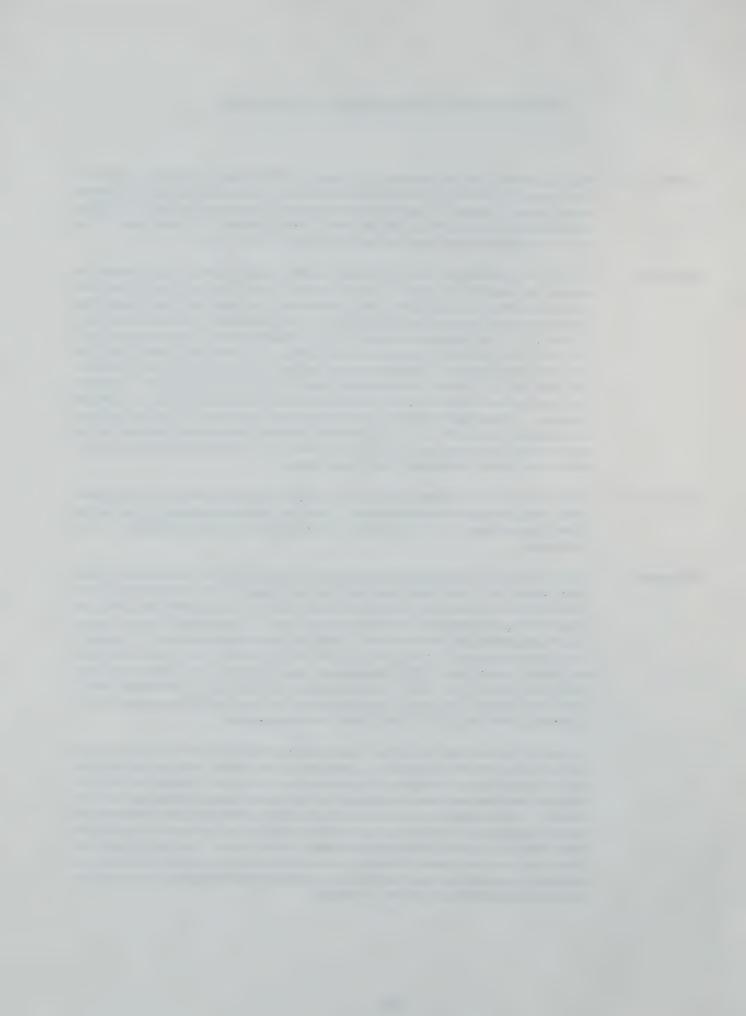
#### Comment 140:

MAPC continues to believe that short-term development patterns illustrate that the Piers area development is substantially below the projections made by the Central Artery Tunnel project. This reinforces the need for new growth projections for the Piers area.

#### Response:

While the MBTA recognizes that development projected for the South Boston Piers area by the CA/T Project has been less than anticipated in the short term, it is also believed that the near-term transportation needs of the area by the year 2000 will require the service provided by the Transitway Project. For example, the new Federal Courthouse scheduled for completion in 1998 will create large demands on the area's transportation network. Parking at the Courthouse, which will employ 816 employees and attract an additional 2,200 persons each day, is limited to only 63 spaces. As a result, the Transitway is critical to the successful operation of the Courthouse; indeed, the availability of a high level of transit service, such as that to be provided by the Transitway, was a key factor in the Courthouse siting decision.

It is further believed that the unique locational advantages of the Piers area, such as adjacency to downtown Boston and Logan International Airport, deep port capabilities, and full interchange to the state highway system and other transportation infrastructure, will drive eventual development of the area at levels projected by the CA/T Project. Thus, although short-term development in the Piers area is somewhat less than anticipated, an unparalleled opportunity exists to build the transit infrastructure today that can support intense development in the future. Proceeding with the Transitway now will greatly reduce costs and disruption. Another advantage is reflected in the ability to orient development patterns in the Piers area in a manner that encourages future ridership on the Transitway.



#### Comment 141:

The FEIS does not address the financial impact on the MBTA of the project only receiving 50 percent federal funding as was required by the Federal Transit Administration [FTA]. This is a significant problem in the FEIS that is carried over from previous environmental submittals.

### Response:

Such analysis was not required by the FTA, although sensitivity analyses of changes in key economic assumptions were performed. The financial analysis presented in the FEIS/FEIR was performed in accordance with guidance provided by FTA, and was reviewed and approved by FTA prior to publication. Currently, the MBTA is negotiating a Full Funding Grant Agreement with FTA that establishes the terms and conditions of federal funding participation in the project. This agreement assumes 80 percent federal participation, as reflected in the FEIS/FEIR.

### Comment 142:

The MBTA should not count on the use of Congestion Mitigation and Air Quality [CMAQ] or Surface Transportation Program [STP] funding for this or other projects without consulting with the MPO agencies that represent local governments. Over the past two years the MAPC cities and towns have sacrificed local transportation projects that have allowed the MBTA to maximize the funds available to the Old Colony Railroad Restoration project and provide improvements at historic rail stations.

## Response:

The MBTA has assumed that the source of all federal funding for the Transitway Project is the Section 3 program, which distributes grants through a combination of formula, legislatively-mandated "earmarks," and the discretion of the Secretary of Transportation. A total of \$278 million of Section 3 funds has been authorized for the first implementation phase of the Transitway in the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991. The MBTA has requested an increase in this authorized amount as part of the current ISTEA reauthorization bill. No CMAQ or STP funding has been assumed in the Transitway's financing plan.

### Comment 143:

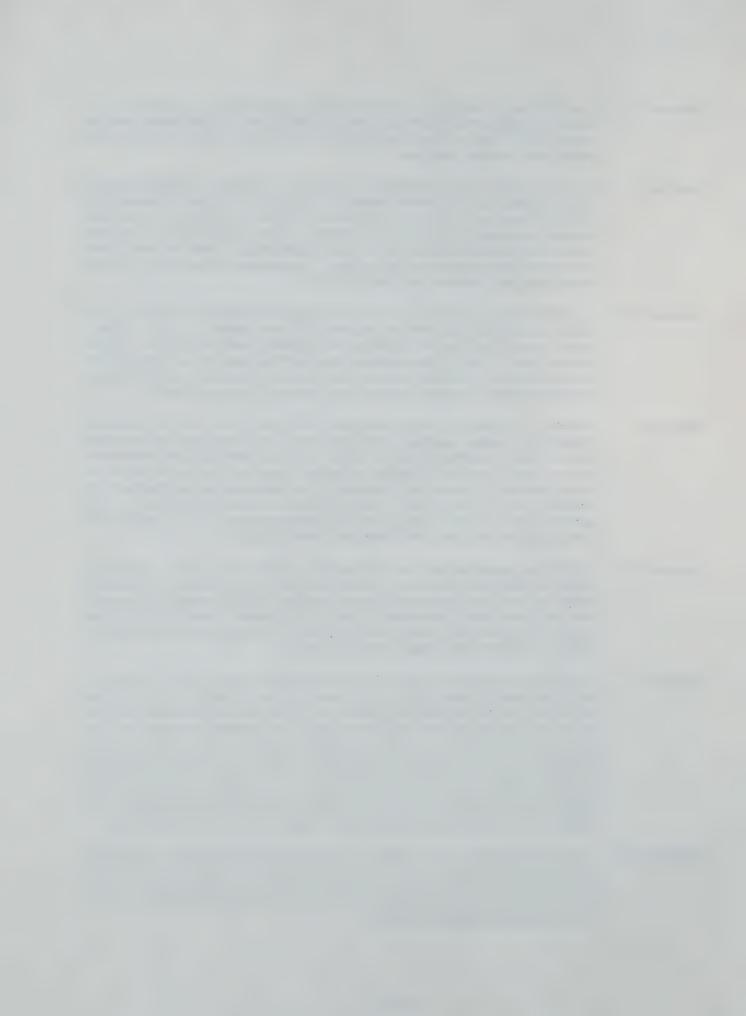
The FEIS suggests that the construction schedule can be tailored to the availability of 80 percent federal funding, even if construction delays are required. Construction delays, inevitably mean increased construction costs. The FEIS does not provide any estimate of increases in costs due to the lack of 80 percent federal funding. If the project is solely delayed due to funding availability, increased costs, proportional to those of the Central Artery project could be anticipated.

#### Response:

The MBTA fully recognizes that delays in the Transitway's construction schedule can lead to increases in project costs. To address this issue, the MBTA is negotiating as part of its Full Funding Grant Agreement with FTA the right to recover all non-programmed project costs that result from less than anticipated federal funding in any given year. This condition will protect the MBTA and the state in two ways. First, the MBTA will not be held liable for project cost increases that accrue from any delay in the construction schedule that is directly related to underfunding of the annual 80 percent federal share. Second, the state shall be reimbursed for any advance in the local funding share if such an action is deemed necessary to maintain the project schedule; again, this condition must be directly related to a federal funding shortfall.

#### Comment 144:

Further, we would like to see the FEIS consider the future cost estimate for the project based upon anticipated costs in the year individual contracts may be let. This is particularly important to estimate the true federal funding needs for this project and would allow for anticipating some of the cost increases that have befallen large projects such as the Central Artery project.



### Response:

All costs presented in the Transitway Project's financial analysis are calculated in year-of-expenditure dollars which incorporates an escalation factor. In other words, the project's cost estimate is, in fact, based on anticipated costs in the year in which individual contracts are scheduled to be let. This approach is consistent with FTA guidelines for financial analysis, and is critical in terms of estimating future funding needs, both at the state and federal levels.

#### Comment 145:

Table 6-3 of the FEIS illustrates fluctuations in annual state assistance to the MBTA. In some years, the state assistance is expected to increase by about 9 percent and in other years by less than 5 percent. These fluctuations are used to provide an average increase between 1993 and 2015 of around 5.1 percent. MAPC would suggest that the increases over 5.1 percent in any given year are unrealistic since this has been the cap in increases in assistance in recent years. We would suggest that financial viability for this project would hinge on the ability for the MBTA to cover expenses and not reduce services within the 5.1 percent year to year increase fiscal constraint.

## Response:

As shown in the financial analysis prepared for the Transitway Project, the average annual growth in state assistance to the MBTA is projected to be 5.1 percent between 1993 and 2015. It should be noted that this growth rate represents a significant improvement over the average annual rate of 8.1 percent assumed in the DEIS/SDEIR, due in large part to recent MBTA budget initiatives to control the Authority's reliance on state support. In some intervening years, however, the annual growth will exceed the average rate of 5.1 percent. These relatively few near-term exceedances are due to federal and state mandates that require the MBTA to undertake a number of capital improvements to its transit system.

Specifically, adherence to federal legislation such as the Americans with Disabilities Act (ADA) and the Clean Air Act and Amendments (CAAA) will require a capital investment of \$2.1 billion over the next seven years. These mandated capital improvements place a burden on the MBTA's budget in the next five years, which will require a short-term increase in state assistance. It is these efforts combined with maintenance of the MBTA's existing system, not investment in the Transitway Project, that causes the temporary near-term fluctuations in the growth of state assistance.



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National Association of Railroad Passengers

January 28, 1994

Mary Beth Mello, Deputy Regional Administrator, TO: Region One Federal Transit Administration 55 Broadway Cambridge, MA 02142

COMMENTS OF THE NATIONAL ASSOCIATION OF RAILROAD PASSENGERS ON THE FINAL ENVIRONMENTAL IMPACT STATEMENT, SOUTH BOSTON PIERS FORT POINT CHANNEL TRANSIT PROJECT (EOEA #6826).

We note that the EIS does not mention the North Station-South Station Rail Link which Governor Weld has proposed be included in the Central Artery Project (and Central Artery alignment).

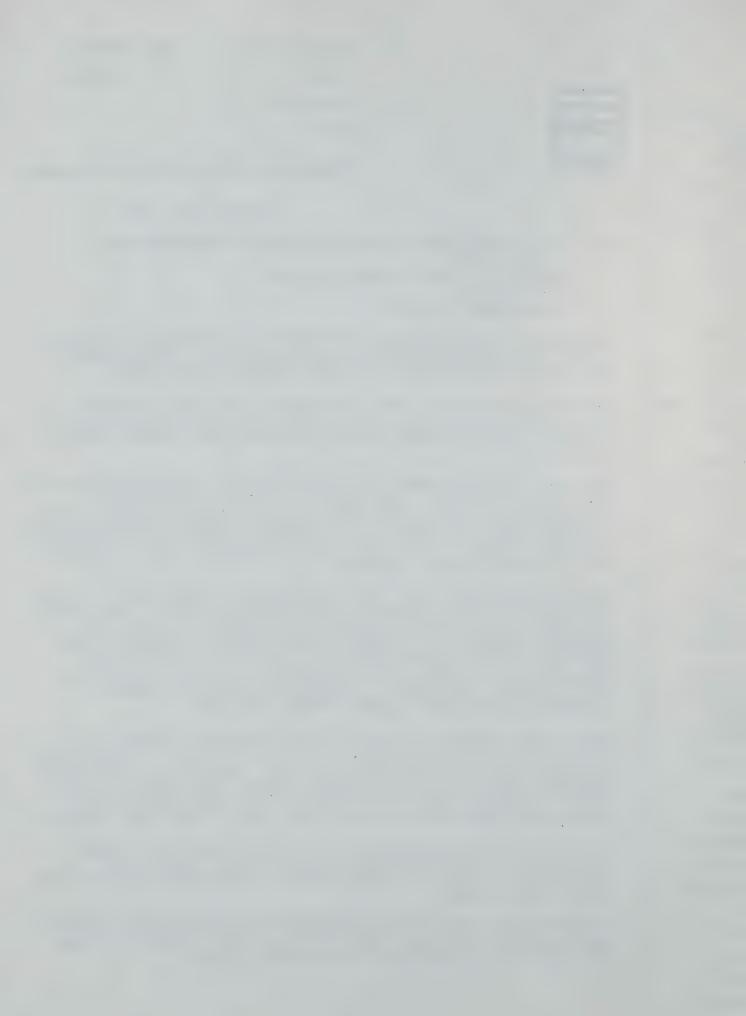
This rail link, however, may well be vital to the success of the transit project. The rail link will provide most commuter rail riders from the "North Station suburbs"\* with a single-seat ride from their suburban commuter rail station to South Station, where transfer can be made to the proposed South Boston transit service.

In the absence of this link, such people would have to make a minimum of two transfers, assuming availability and public acceptance of the boat and bus connections the EIS does mention [NORTH-SIDE COMMUTER TRAIN--GREEN OR ORANGE LINE--RED LINE--SOUTH BOSTON TRANSIT], or three transfers and considerable walking if one attempts to use the existing rail transit connections [NORTH-SIDE COMMUTER TRAIN--PROPOSED BUS OR BOAT -- SOUTH BOSTON TRANSIT].

To a lesser extent, the rail link also would benefit the transitway by providing direct rail service to South Station from New Hampshire and Maine points. Amtrak is expected to commence North Station-Portland service this year, service which doubtless would be operated as an extension of New York-South Station service as soon as the rail link is open.

It is a transit-industry rule-of-thumb that each forced transfer cuts ridership potential in half, hence the importance of the improved access to South Station the rail link will provide.

<sup>\*</sup> Four main lines: Fitchburg-Ayer-Concord-Waltham; Lowell-Wilmington-Winchester; Haverhill-Lawrence-Andover-Reading-Melrose; Ipswich/Rockport-Beverly-Salem-Lynn



## **National Association of Railroad Passengers**

#### Comment 146:

We note that the EIS does not mention the North Station-South Station Rail Link which Governor Weld has proposed be included in the Central Artery Project (and Central Artery alignment). This rail link, however, may well be vital to the success of the transit project. The rail link will provide most commuter rail riders form the "North Station suburb" with a single-seat ride from their suburban commuter rail station to South Station, where transfer can be made to the proposed South Boston transit service.

## Response:

In accordance with Federal Transit Administration (FTA) guidelines for estimating the ridership demands of a new transit infrastructure project, only those projects that are committed in the MBTA's five-year capital plan can be assumed in the background transportation network used to estimate ridership. The North Station-South Station Rail Link was not proposed at the time that ridership forecasting for the Transitway Project was performed. Even without the benefit of the Rail Link, however, a high demand for Transitway services was projected, with a transit mode share of roughly 60 percent in the peak hour. These ridership results were reviewed and approved by FTA.

The North Station-South Station Rail Link would facilitate connections between the northern suburbs and the South Boston Piers area. Were the Rail Link to be constructed, passengers from northern suburbs could access South Station directly where they could then transfer to the Transitway service. This would eliminate the need for supplementary surface shuttle bus service to North Station as part of the Transitway Project. Blue Line riders would still need a surface shuttle bus from Aquarium Station to avoid a second transfer to reach the Piers area. Construction of the Transitway does not in any way preclude the Rail Link, which has been proposed to be constructed underneath the depressed Central Artery.

A consultant team has been selected to prepare an environmental impact statement for the North Station-South Station Rail Link which will incorporate the Transitway Project in its ridership forecasting model. As the Rail Link project progresses, minor adjustments can be made to the Transitway's supplemental surface bus plan to reduce overall project costs and take advantage of the improved connections to the northern suburbs. Coordination will be ongoing as both projects proceed.



## PAPPAS MANAGEMENT CORPORATION

655 Summer Street Boston, MA 02210 (617) 330-9797

January 24, 1994

Ms Mary Beth Mello
Deputy Regional Administrator
U.S. Department of Transportation
Federal Transit Administration - Region I
55 Broadway
Cambridge, MA 02142

RE: South Boston Piers / Fort Point Channel Tenant Project Final Environmental Impact Statement / Final Environmental Impact Report (FEIS/FEIR) EOEA Number 6826

Dear Ms Mello:

147

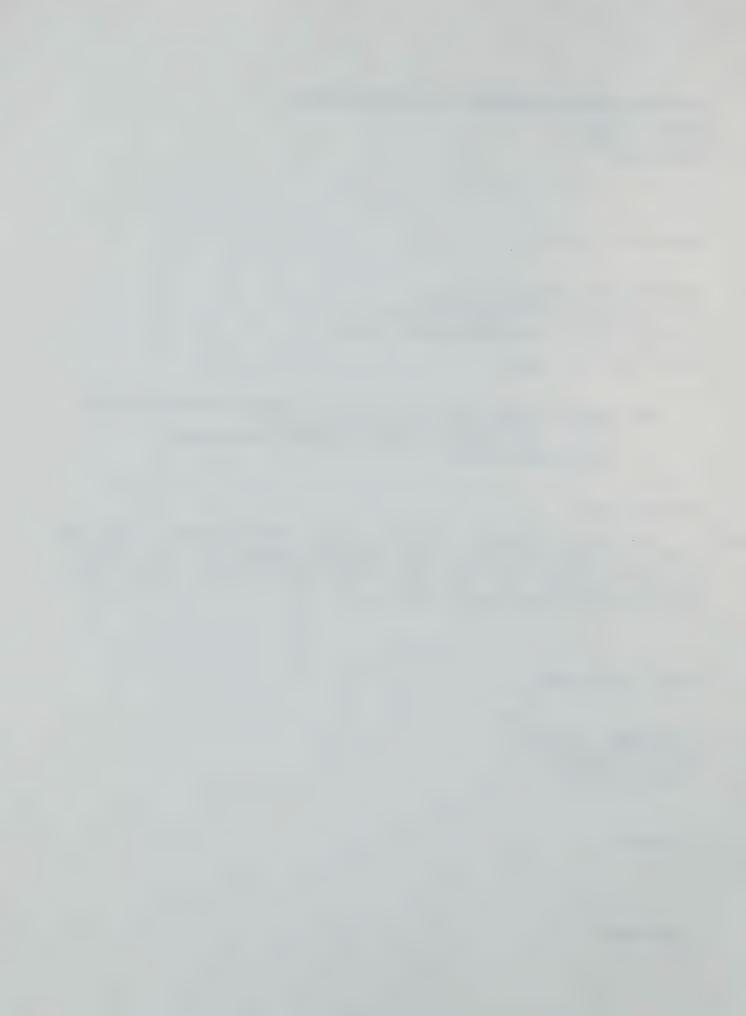
We are in receipt of your letter dated December 1993 and hereby notify you that we are strongly opposed to the proposed locations for the storage and maintenance facility as described in section E5,2.2.1 on page ES-10; and as shown on Figure ES-2 Underground Transitway Alternatives.

Very truly yours,

William Vrettas Vice President

ljd/WTV

:doc\wtv\fedtran1



## **Pappas Management Corporation**

#### Comment 147:

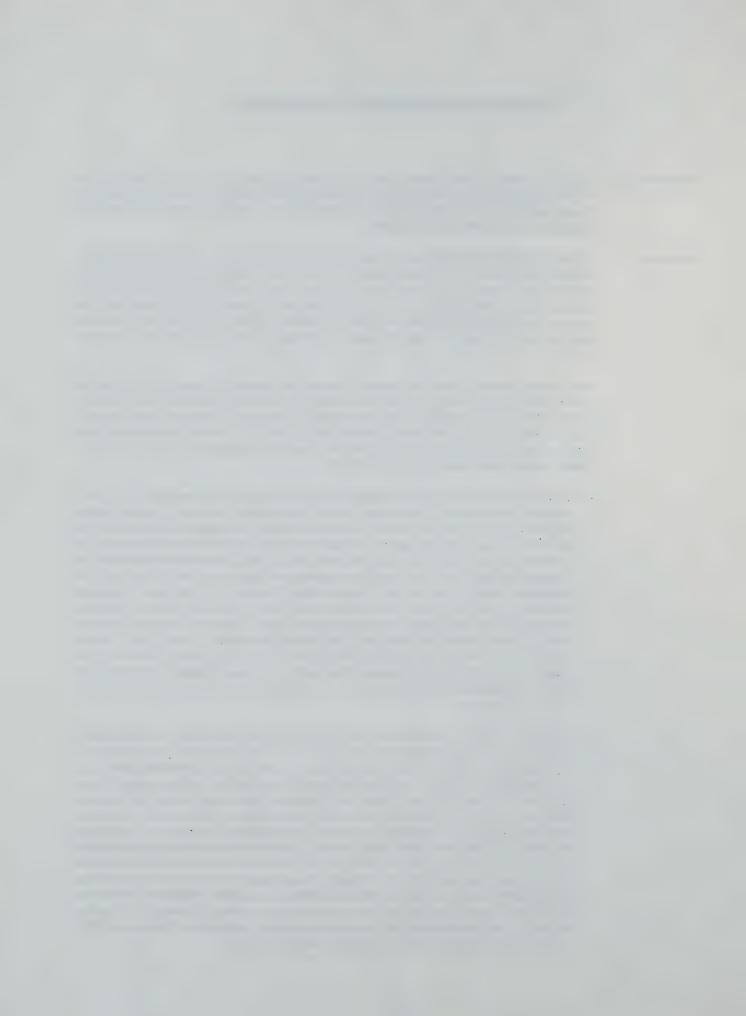
We are in receipt of your letter dated December 1993 and hereby notify you that we are strongly opposed to the proposed locations for the storage and maintenance facility as described in Section E.5, 2.2.1 on page ES-10; and as shown on Figure ES-2 Underground Transitway Alternatives.

## Response:

In the FEIS/FEIR, the MBTA analyzed two potential sites for the Transitway Project's maintenance and storage facility. Site A is located at the corner of Summer Street and Pappas Way, while Site B is located on West First Street between E Street and Pappas Way; both sites are located within Chapter 91 jurisdiction. These two sites were screened from a larger number of potential sites, and both were deemed appropriate for location of a maintenance and storage facility to support the Transitway Project.

After several meetings with the Massachusetts Port Authority (Massport) and Pappas Management Corporation, the owners or representatives of the owners of the two sites under consideration, the MBTA has selected Site B on West First Street for location of the Transitway Project's maintenance and storage facility. The site is preferable over Site A given that no impact to existing water-dependent uses would result. Site B also meets several other important design criteria:

- Selection of this site will not displace any existing water-dependent use. This criterion is particularly important, since the economic vitality of South Boston depends in large part on the area's water-dependent businesses and industries. A portion of Site A located at the corner of Summer Street and Pappas Way is currently used for Subaru overflow vehicle parking; since these vehicles are transported by water, this overflow parking lot is determined to be a water-dependent use. Although Site B is also within Chapter 91 jurisdiction, it does not contain any existing water-dependent uses. It is, therefore, a more desirable location for the Transitway's maintenance facility. Tenants of the site, which is predominantly owned by Massport and partially owned by Atlantic, Inc., include Fortress Records, Corporate Printing Company, Shaughnessy Warehouse, Roadway Trucking, PPG Industries, Yankee Bus, Emerson College, NYNEX, U.S. Postal Service parking, Boston Harbor Industrial Development Corporation, and E Street Associates.
- The site is roughly one-half mile from the Transitway portal, and is located along a future Transitway route to residential South Boston as part of the full build configuration. This location thus minimizes non-revenue producing trips (i.e., "deadheading") for transit vehicles beginning or ending their service routes. It also reduces the need to install additional catenary (overhead wires that provide electrical power to the trackless trolley vehicles) as part of the full build Transitway to extend surface service into residential South Boston; catenary will simply be extended from the West First Street facility. The ability to utilize the same catenary for non-revenue trips to the maintenance facility and revenue trips into residential South Boston as part of the full build Transitway will reduce both one-time construction and ongoing operating and maintenance costs. In addition, combined use of the catenary will limit potential adverse environmental impacts, including visual and aesthetic impacts of the overhead catenary and support structures. This is an important issue as the Piers area streetscape evolves.



- The surrounding area is compatible with activities associated with the Transitway's
  maintenance and storage facility. The site is adjacent to other light industrial
  development, and the area in which it is located is expected to remain in such use
  for the long term. No residential or commercial areas will be affected.
- The site is physically suited to development as a maintenance and storage facility.
  There are a few structures on the site that would need to be removed. Utility service is adequate, eliminating the need for costly infrastructure work. The parcel is regularly shaped, enabling efficient use of the parcel for construction and operation of the facility.
- No hazardous waste spills or releases were identified at this site, based upon review of files of the U.S. Environmental Protection Agency and the Massachusetts Department of Environmental Protection.



1212134



# SIERRA CLUB Greater Boston Group

3 Joy Street, Boston, MA 02108 (617) 227-5339

Trudy Coxe, Secretary Executive Office of Environmental Affairs 20th Floor 100 Cambridge Street Boston, MA 02202 Attn: MEPA Unit

February 9, 1994

Comments on FEIS/FEIR for the South Boston Piers/Fort Point Channel Transit Project - ECEA 6826

In general the Club supports any alternative that reduces single occupant automobile usage, and increases transit ridership. Of the alternatives presented, the Full Build would appear to best meet our criteria.

However, the Club has a few questions and concerns.

- North Station to South Station Rail Link There is no analysis of the 148 impacts of the proposed Central Artery Rail Link (CARL). Planning for this project is underway and a report by the Central Artery Rail Link Task Force was issued in May, 1993. CARL will have a significant impact on the transportation system of the entire Boston metropolitan area, including South Station and the Fort Point Channel/South Boston Piers area. CARL will interface with all of the proposed actions at South Station and has the potential to change or modify many of the assumptions made in the final draft. The construction of both the Transitway and CARL will occur at the same time and in the same alignment, and yet there is no mention of this in the FEIS/FEIR.
- Light Rail Options Although any Transitway options will be 149 constructed to accommodate eventual conversion to light rail, we would like to have more information on how such a system might look and operate. What would happen to the proposed maintenance facility to be built as part of any Transitway or BUS/TSM alternatives if the Transitway were to be converted to light rail?



(2)

# Sierra Club comments on EOEA 6826

- Commercial Vehicle Impacts Even though the Full Build option 150 3. appears to be the best alternative, it results in many bus trips throughout the area, especially between the portal at the World Trade Center and the BMIP. It's important to minimize conflict between transit and the commercial users of the area and we wonder if this subject has been adequately addressed. The construction of the Central Artery Rail Link should be able to reduce some of the need for so many buses.
- Capacity As part of the Meganlex debate, the Massachusetts Highway 151 Department dic. a transportation study of several proposed sites, including one on Northern Agenue. This study indicated that the proposed Transitway would not be able to adequately service such a complex. While talk of a Megaplex appears to be on hold for the time being, there needs to be an analysis done on the transportation impacts of either a convention center or Megaplex in the study area. We are especially conserned with the impact of such a large complex that has a poter fial to generate great demand for transit service in a short time period.
- 152 Washington Replacement Service - The state is restudying the feasibility of this service being light rail instead of rackless trolley. If so, LRV's would enter Boylston Street Station on the currently abandoned outside tracks. Would the construction of an underground Transitway station preclude this option? It doesn't appear to in the report, but we would like a definite answer.
- In all the discussions on possible bus routings, there is no mention of 153 local bus service to East Boston. Are folks living around Maverick and Central Squares going to have to continue to take the Blue Line to downtown Boston and backtrack all the way to South Station and the Piers/Fort Point Channel area?

If you have any questions, please call me at \$84-9580.

John F. Deilcon

Sincerely

Transportation Chair



# Sierra Club

#### Comment 148:

North Station to South Station Rail Link – There is no analysis of the impacts of the proposed Central Artery Rail Link (CARL). Planning for this project is underway and a report by the Central Artery Rail Link Task Force was issued in May 1993. CARL will have a significant impact on the transportation system of the entire Boston metropolitan area, including South Station and the Fort Point Channel/South Boston Piers area. CARL will interface with all of the proposed actions at South Station and has the potential to change or modify many of the assumptions made in the final draft. The construction of both the Transitway and CARL will occur at the same time and in the same alignment, and yet there is no mention of this in the FEIS/FEIR.

#### Response:

In accordance with Federal Transit Administration (FTA) guidelines for estimating the ridership demands of a new transit infrastructure project, only those projects that are committed in the MBTA's five-year capital plan can be assumed in the background transportation network used to estimate ridership. The North Station-South Station Rail Link was not proposed at the time that ridership forecasting for the Transitway Project was performed. Even without the benefit of the Rail Link, however, a high demand for Transitway services was projected, with a transit mode share of roughly 60 percent in the peak hour. These ridership results were reviewed and approved by FTA.

The North Station-South Station Rail Link would facilitate connections between the northern suburbs and the South Boston Piers area. Were the Rail Link to be constructed, passengers from northern suburbs could access South Station directly where they could then transfer to the Transitway service. This would eliminate the need for supplementary surface shuttle bus service to North Station as part of the Transitway Project. Blue Line riders would still need a surface shuttle bus from Aquarium Station to avoid a second transfer to reach the Piers area. Construction of the Transitway does not in any way preclude the Rail Link, which has been proposed to be constructed underneath the depressed Central Artery.

The MBTA has selected a consultant team to prepare an environmental impact statement for the North Station-South Station Rail Link which will incorporate the Transitway Project in its ridership forecasting model. As the Rail Link project progresses, minor adjustments can be made to the Transitway's supplemental surface bus plan to reduce overall project costs and take advantage of the improved connections to the northern suburbs. Coordination will be ongoing as both projects proceed.

### Comment 149:

Light Rail Options – Although any Transitway options will be constructed to accommodate eventual conversion to light rail, we would like to have more information on how such a system might look and operate. What would happen to the proposed maintenance facility to be built as part of any Transitway or Bus/TSM alternatives if the Transitway were to be converted to light rail?

#### Response:

As noted, key features of the Transitway, including horizontal and vertical alignment and clearances, electrical power, and station platforms, have been designed to permit a potential future conversion to light rail if warranted by a change in the demand characteristics of the Piers area. A light rail option for operation in the Transitway tunnel was dropped from further consideration during the DEIR phase of the project, based on an assessment that articulated bus technology was better able to serve the



developing Piers area. Details about a light rail alignment beyond the Transitway's D Street portal and a light rail operating plan would require significant additional analysis, and would only be conducted at such time that demand characteristics of the Piers area warrant. Likewise, a decision about the proposed facility to store and maintain Transitway trackless trolleys and supplemental diesel buses would require additional analysis.

#### Comment 150:

Commercial Vehicle Impacts – Even though the Full Build option appears to be the best alternative, it results in many bus trips throughout the area, especially between the portal and the World Trade Center and the BMIP. It's important to minimize conflict between transit and the commercial users of the area and we wonder if this subject has been adequately addressed. The construction of the Central Artery Rail Link should be able to reduce some of the need for so many buses.

#### Response:

The MBTA has developed the Transitway Project with the goal of reducing total passenger vehicular traffic in the South Boston Piers area. The surface bus component of the Transitway Project has been designed to minimize operations on the local roadway network while providing good interconnections with the MBTA's existing rapid transit system. The initial build Transitway, which consists of a tunnel extending from South Station to the World Trade Center, will require the operation of surface bus shuttles to provide connections to the Orange and Green Lines at New England Medical Center and Copley Center, respectively. These shuttles will be eliminated once the full build Transitway tunnel is extended from South Station to Chinatown and Boylston Stations.

Traffic analysis performed for both the initial build and full build Transitway has shown that all intersections operate at level of service (LOS) D or better in the peak hour, with the exception of D Street and Massport Haul Road under the initial build operating condition. This intersection was shown to operate at LOS E. However, grade separation of the D Street/Massport Haul Road intersection as proposed by the CA/T Project as part of its South Boston Truck Access and Circulation Study (April 1994) will resolve this issue. The MBTA believes that, rather than conflicting with Piers area commercial users, the Transitway improves traffic conditions by attracting riders to high occupancy vehicles and by placing these vehicles in a tunnel in the most congested parts of the area. Support for this assertion is reflected in the traffic analysis conducted for the project's No Action Alternative, which resulted in three intersections operating at LOS E and three at LOS F in the peak hour.

As noted in the response to Comment 148 above, the North Station-South Station Rail Link may result in the reduction and/or elimination of the Transitway's supplemental surface bus routes. The MBTA will coordinate work on both projects as they are advanced, and adjustments to the Transitway's surface bus plan will be made as appropriate.

#### Comment 151:

Capacity – As part of the Megaplex debate, the Massachusetts Highway Department did a transportation study of several proposed sites, including one on Northern Avenue. This study indicated that the proposed Transitway would not be able to adequately service such a complex. While talk of a Megaplex appears to be on hold for the time being there needs to be an analysis done on the transportation impacts of either a convention center or Megaplex in the study area. We are especially concerned with the impact of such a large complex that has a potential to generate great demand for transit service in a short time period.



#### Response:

In 1993, the South Boston Piers area was considered as one possible site for a Megaplex.

To determine the ability of the transportation network in the Piers area to support Megaplex trip demands, the CA/T Project with support from the MBTA reviewed the capacity limitations of the Transitway service plan with respect to a large event which would result in large crowds leaving the Piers area. The worst case scenario was assumed to occur at the end of an evening sporting event when there was no other peak hour travel demand. Analysis results indicated that while South Boston has good roadway access, the Transitway service as designed could not serve the entire one-hour departing crush load. The Transitway peak load capacity is 8,900, while the highest demand for transit ranged from 14,580 to 26,730, depending upon assumptions about parking availability which would constrain automobile access.

Additional Transitway vehicles could enhance the capacity of the system, but purchase of additional specialized vehicles would not be a cost-effective solution for intermittent demands generated by, for example, sporting events or concerts. The Transitway service could, however, be supplemented by standard bus service (perhaps using already available buses) to South Station via the Seaport Access Road and the South Station bus ramps. An operating plan that dedicates the Transitway tunnel for express trackless trolley service to Boylston and Chinatown Stations and uses the Seaport Access Road for bus service to South Station would maximize use of the Transitway to Green and Orange Line transfer stations and minimize the impact of surface buses in downtown neighborhoods.

There is currently no preferred site for a possible future Megaplex or convention center.

#### Comment 152:

Washington Replacement Service – The state is restudying the feasibility of this service being light rail instead of trackless trolley. If so, LRV's would enter Boylston Street Station on the currently abandoned outside tracks. Would the construction of an underground Transitway station preclude this option? It does not appear to in the report, but we would like a definite answer.

#### Response:

Connection of a light rail Transitway to a light rail Washington Street Replacement Service at Boylston Station would not be precluded. As described above in the response to Comment 149, all Transitway tunnel design and turning radii are being designed for future conversion to light rail operation if warranted by an unanticipated change in demand characteristics.

#### Comment 153:

In all the discussion on possible bus routing, there is no mention of local bus service to East Boston. Are folks living around Maverick and Central Squares going to have to continue to take the Blue Line to downtown Boston and backtrack all the way to South Station and the Piers/Fort Point Channel area?

### Response:

The MBTA designed the transit alternatives for the South Boston Piers area to provide a high level of service consistent with the goals of reducing traffic congestion. At the same time, the design was sensitive to cost-effectiveness considerations and service policies. The Transitway is intended to maximize the number of passengers entering the area through the Transitway tunnel. Supplementary surface buses were provided to minimize the need for two transfers and to provide direct service to adjacent neighborhoods that lack direct rapid transit connections.



The Maverick Square and Central Square areas of East Boston are well-served by the Blue Line. Access to the Piers area can be achieve by transferring from rapid transit to a shuttle bus from Aquarium or State Stations. Express bus services will operate from other North Shore communities that lack convenient access to Piers area shuttle buses and will benefit from the Third Harbor Tunnel. Orient Heights in East Boston and Winthrop were identified as express bus service areas. An additional stop in East Boston before entering the Third Harbor Tunnel will depend both on the final ramp design for the approach tunnel and on demand for such a stop.

The MBTA believes that the proposed Transitway operating plan, including supplemental bus service, is comprehensive and provides high quality service to the Piers area in a cost-effective manner. At the same time, the proposed supplemental bus component is subject to further review and discussion with community interests before implementation. The MBTA recognizes that the supplemental bus service plan presented in the FEIS/FEIR may change. The goal of the proposed service plan was to identify the cost and ridership potential of fixed guideway transit alternatives so as to guide the decision-making process for a major capital investment. The MBTA expects that some refinements to the supplemental bus service plan will be made prior to implementation.





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TRANSPORTATION SYSTEMS FOR THE TWENTY-FIRST CENTURY

FAX: (617) 482-7413

28 December, 1993

Ms. Mary Beth Mello, Dep. Reg. Admin. USDOT/FTA- Region I 55 Broadway Cambridge MA 02142

Re: EOEA No. 6826 So. Bos. Transit FEIS/EIR

Dear Ms. Mello:

Proponents of the above project, responding to my Comment 304 about life-cycle costing, contend that a people mover would need to be fully underground. This is not true: people movers can be partially (or wholly) elevated. In fact, if integrated into future buildings at a second floor level, substantial savings could be realized.

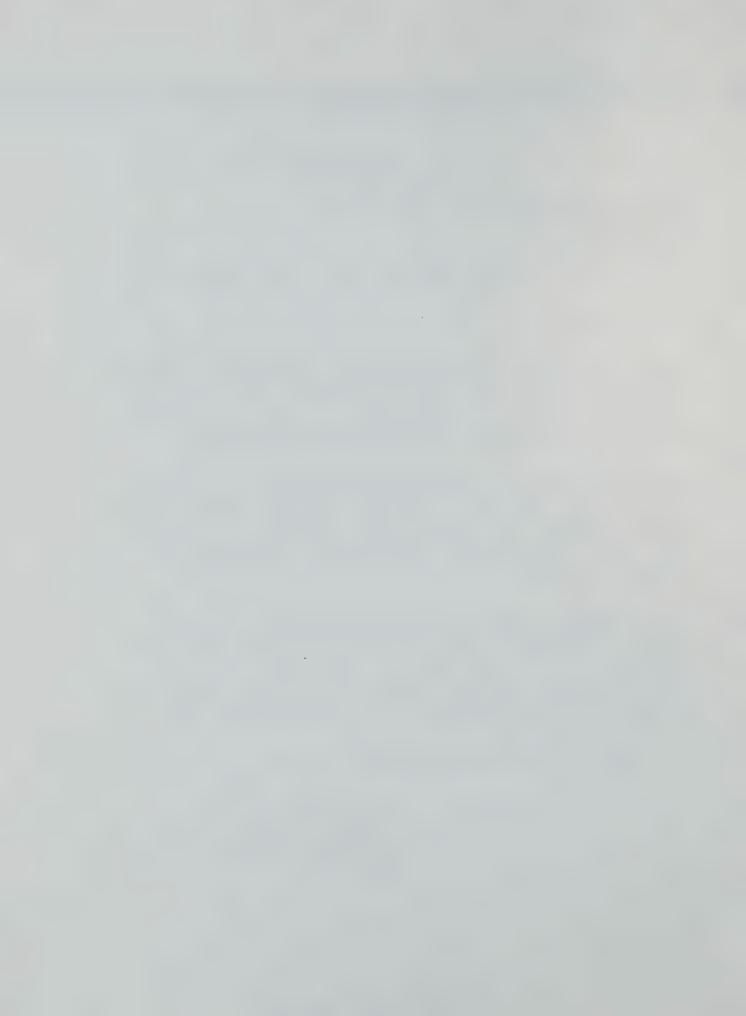
Current public and private plans envision a dense commercial district from Fort Point Channel to the World Trade Center. The transitway must serve its needs. To the east lie substantially less dense industrial zones with travel patterns very different from the future piers area. Why then do their needs -- and without life cycle cost analysis! -- determine the modal future of the denser commercial zone?

The more frequent and flexible service of a people mover should greatly increase ridership in the dense pier district compared to bus or light rail alternatives. The proponents are perhaps unaware of the dramatic results achieved in Lille, France, where ridership on a people mover metro has surpassed forecasts, increased metropolitan transit ridership 50%, and operates in the black (fare revenue exceeds 0&M costs).

Thank you for your kind attention.

Lawrence J. Fabian

Director



# **Transportation Systems for the Twenty-First Century**

Comment 154:

Proponents of the above project, responding [in the FEIS/FEIR] to my Comment 304 about life-cycle costing, contend that a people mover would need to be fully underground. This is not true: people movers can be partially (or wholly) elevated. In fact, if integrated into future buildings at a second floor level, substantial savings could be realized.

Response:

The elevated people mover concept was eliminated at the DEIR phase of project planning due to urban design and operational problems. If such a system were to be integrated into future development, that development would need to occur prior to the implementation of the transit system. The transit project will precede development, providing encouragement and support for future development in the South Boston Piers area, not vice versa.

Comment 155:

Current public and private plans envision a dense commercial district from Fort Point Channel to the World Trade Center. The transitway must serve its needs. To the east lie substantially less dense industrial zones with travel patterns very different from the future piers area. Why then do their needs — and without life cycle cost analysis! — determine the modal future of the denser commercial zone?

Response:

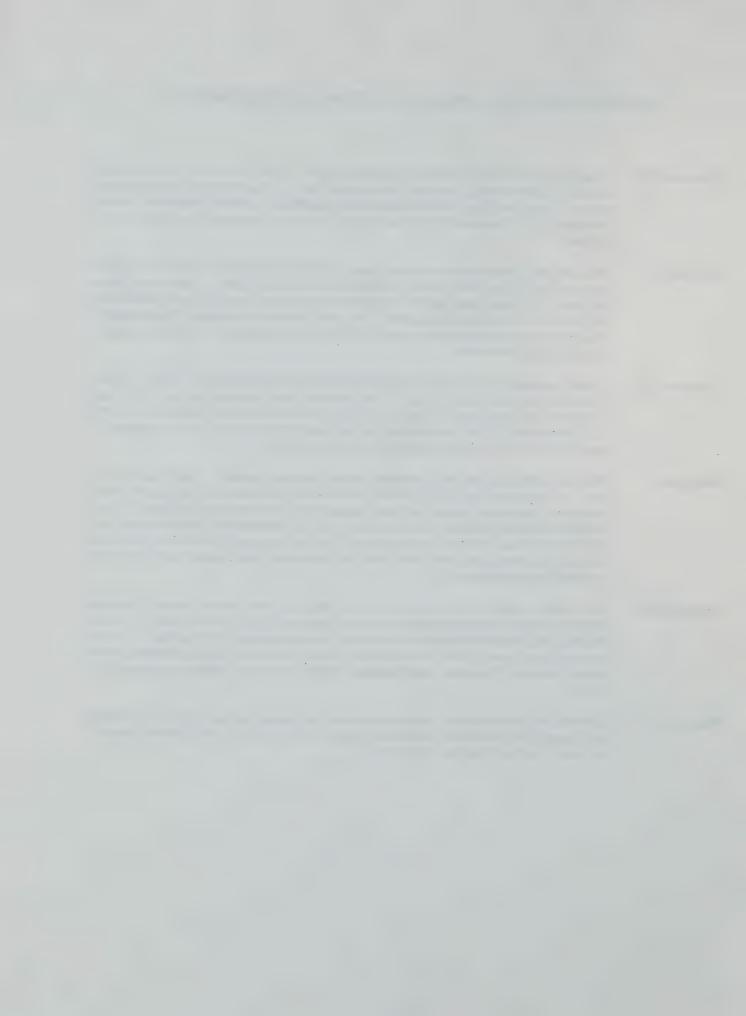
The MBTA has designed the Transitway Project to serve the entire South Boston Piers area. In the western and central thirds of the area, the Transitway will be in tunnel, eliminating surface congestion in these densely developed commercial zones. A less expensive surface alignment is proposed in the less congested industrial eastern third of the Piers area. The MBTA believes that it is has balanced the current and future needs of the developing Piers area, and has selected a transit mode that is well able to serve those diverse needs.

Comment 156:

The more frequent and flexible service of a people mover should greatly increase ridership in the dense pier district compared to bus or light rail alternatives. The proponents are perhaps unaware of the dramatic results achieved in Lille, France, where ridership on a people mover metro has surpassed forecasts, increased metropolitan transit ridership 50 percent, and operates in the black (fare revenue exceeds O&M costs).

Response:

The MBTA is aware of the referenced system, but, again, believes that the flexibility and capacity of articulated trackless trolleys is best suited to the demand characteristics of the South Boston Piers area.





# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION I** 

JOHN F. KENNEDY FEDERAL BUILDING ONE CONGRESS STREET BOSTON, MASSACHUSETTS 02203-2211

January 25, 1994

Mary Beth Mello
Deputy Regional Administrator
U.S. Department of Transportation
Federal Transit Administration - Region I
55 Broadway
Cambridge, MA 02142

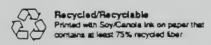
Dear Ms. Mello:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency has reviewed the Final Environmental Impact Statement (FEIS) for proposed transit improvements to the South Boston Piers area and portions of downtown Boston, Massachusetts.

According to the FEIS, the alternative selected for implementation is the Fort Point Channel Underground Transitway linking new development areas in the South Boston Piers area to regional mass transit services in downtown Boston. The Transitway would consist of a tunnel for trackless trolleys from the MBTA's Boylston Station to the World Trade Center, with intermediate station connections at Chinatown, South Station, and the proposed Federal Courthouse at Fan Pier. East of the World Trade Center, service would continue on surface streets using on-street bus stops between Boston Marine Industrial Park, Summer Street, and City Point.

Based on our review of the FEIS, we believe the concerns we raised in our comments on the Draft EIS have been satisfactorily resolved. The air quality analysis in the FEIS adequately demonstrates that the preferred alternative will not cause new violations of National Ambient Air Quality Standards, will not worsen existing exceedances of the standards, and will result in reductions of air pollutants. We believe that the air quality analysis in the FEIS will enable the Federal Transit Administration (FTA) to prepare its project level conformity determination, and we request that this determination be included in the Record of Decision.

In keeping with the federal government's commitment to pollution prevention, we encourage the FTA to require that the project incorporate energy efficient lighting technologies. EPA has undertaken a program, called Green Lights, to promote the use of these technologies because of their benefits in energy savings and reduction in pollutants caused by electricity generation. The tunnel, stations, and maintenance facilities proposed as part of the Fort Point Channel Transitway offer an excellent opportunity





for use of energy efficient lighting technologies, and we urge FTA to incorporate them as an integral feature of the project.

We look forward to receiving a copy of your Record of Decision when it becomes available. In the meantime, if you have any questions about these comments, feel free to call me at 617/565-3422.

Sincerely,

Elizabeth Higgins Congram

Assistant Director Environmental Review



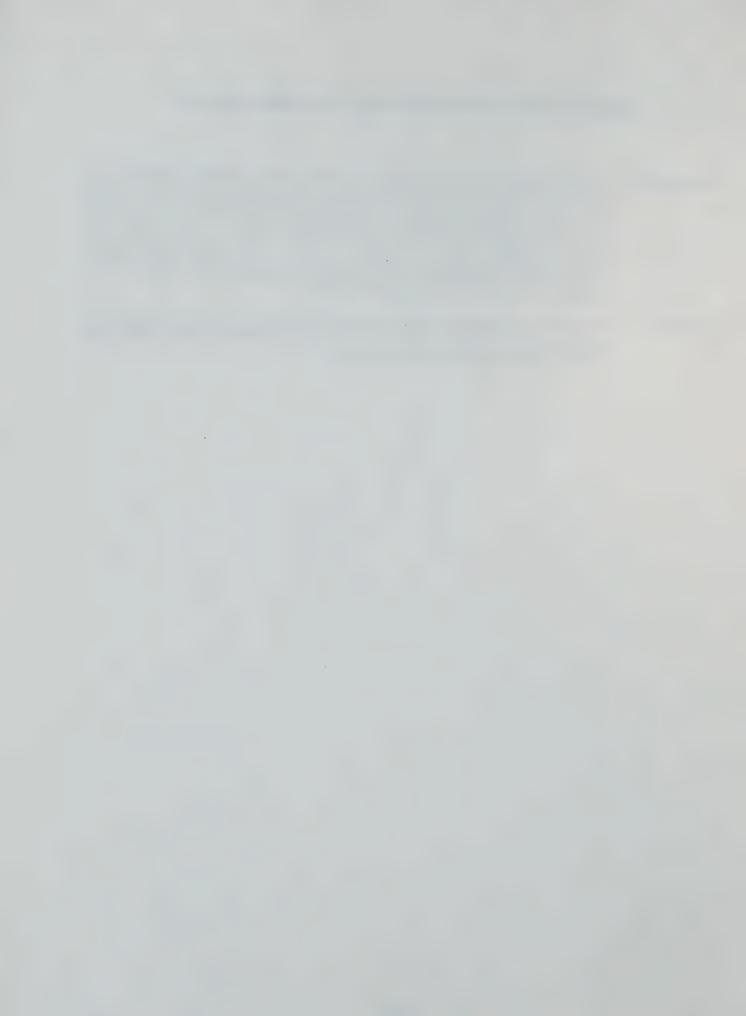
# **United States Environmental Protection Agency**

#### Comment 157:

In keeping with the federal government's commitment to pollution prevention, we encourage the FTA to require that the project incorporate energy efficient lighting technologies. EPA has undertaken a program, called Green Lights, to promote the use of these technologies because of their benefits in energy savings and reduction in pollutants caused by electricity generation. The tunnel, stations, and maintenance facilities proposed as part of the Fort Point Channel Transitway offer an excellent opportunity for use of energy efficient lighting technologies, and we urge FTA to incorporate them as an integral feature of the project.

# Response:

The MBTA will work with agencies such as the Federal Transit Administration (FTA) and the Boston Environment Department to implement energy efficient lighting in the design of Transitway facilities where feasible.











reply to: 5 Doublet Hill Road

Weston, MA 02193 tel. 617-647-7833 fux 617-647-9260

TO: Massachusetts Bay Transportation Authority

attn: Curtis G. Nikitas, Federal Affairs Coordinator

fax: 723.1969

FR: Robert S. Stargie, FAIA

Chair, Regional Design Committee

RE: South Boston Piers Transitway Project

DT: 12 January 1994

The South Boston Piers area was identified some ten years ago by the Greater Boston Chamber of Commerce together with the Boston Society of Architects as deserving the first priority for expansion of the downtown business district. The area is the logical extension of the Summer Street, Congress Street and Northern Avenue arteries.

It is time to integrate the area with the MBTs mil system. The World Trade Center, Federal Courthouse and resjor restaurants deserve better access. Activity for future hotels and office buildings reinforce the need. The area last been mentioned for a new convention center

Along with the connection of the Blue Line to Charles Station, the South Boston Piera Transitway should have the top priority for Boston's business district.

ce: Richard Fitzgerald, Executive Director

The Boston Society of Architects
52 Broad Street
Boston, Massachusetts 02103-4301

617 951 1433 800 662 1235 (in Mass.) Fax: 617 951 0845

A Chapter of the American Institute of Architects



# PEABODY & ARNOLD

COUNSELLORS AT LAW

50 Rowes Wharf

Boston, Massachusetts 02110-3342

Telephone (617) 951-2100

Fax (617) 951-2125

DIRECT DIAL NUMBER

(617) 951-2080

One Citizens Plaza, 8th Fl Providence, Rhode Island 02903 Telephone (401) 831-8330 Fax (401) 831-8359

January 25, 1994

# BY MESSENGER

Ms. Mary Beth Mello, Chief of Program Development Department of Transportation Federal Transit Administration - Region I 55 Broadway Cambridge, MA 02142

Secretary of Executive Office of Environmental Affairs Commonwealth of Massachusetts 100 Cambridge Street 20th Floor Boston, MA 02202

Attention: MEPA Unit: EOEA No. 6826

Re: South Boston Piers/Fort Point Channel Transit Project

Final Environmental Impact Statement

Final Environmental Impact Report - EOEA #6826

# To whom it may concern:

I am writing to you on behalf of Boston Wharf Co., which owns 30 acres of land containing 70 commercial, industrial, non-residential buildings with approximately 3,500,000 square feet of floor area in the Fort Point Channel section of Boston. The land owned by Boston Wharf Co. is, in part, adjacent to the above-referenced transit project. By this letter, Boston Wharf Co. would like to register its support for the project as described in the above-referenced Final Environmental Impact Statement/Final Environmental Impact Report. We understand that the locations of all of the improvements have not yet been precisely fixed.



#### PEABODY & ARNOLD

Ms. Mary Beth Mello, Chief of Program Development Secretary of Executive Office of Environmental Affairs January 25, 1994 Page 2

As a result, we would like to be kept informed as to location of improvements and construction areas to the extent that they affect Boston Wharf Co.'s property rights.

Sincerely,

John K. Dineen, Attorney for Boston Wharf Co.

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cc: Robert N. Kenney, General Manger
Mr. Curt G. Nikitas
Ms. Mary R. Ainsley
Michael F. Burke, Esq.

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